

INTER OFFICE MEMORANDUM

TO: Kendall Moore, Ohio Project Officer, U.S. EPA Region V

FROM: Charlotte E. Hammar, Ohio EPA-DERR, Chemical Emergency
Prevention Unit-PCB

SUBJECT: PCB Inspection conducted November 30, 1992 through
December 1, 1992 at Marion Steel Company, Marion, Ohio

DATE: January 12, 1993

The facility had been inspected in July 7, and August 31 of 1989 and was cited for: (1) failing to register it's PCB transformers with the appropriate fire response personnel, (2) storage of combustible materials (cardboard box) near a PCB transformer, (3) failing to label M_L the means of access to its PCB transformers and failure to label M_L the PCB storage area, (4) failing to properly store a PCB transformer in a diked PCB storage area, (5) failing to maintain PCB Annual Documents for 1983 through 1988 and disposal documentation on PCB oil from retrofilled transformers and, (6) failing to maintain quarterly transformer inspection records on it's PCB transformers. In addition, a PCB capacitor spill was discovered in the facility's Main Substation. Gravel samples obtained by EPA on the floor of the Main Substation were 69,000 ppm PCB.

Marion Steel was reinspected on November 30 and December 1, 1992 and the following violations were discovered at the time of inspection:

40 CFR Section 761.180(a): Recordkeeping

The facility was not maintaining Annual PCB Document Logs for 1989, 1990 and 1991. Records that were kept had the following deficiencies:

- Time period covered by the Annual Document Log was not specified on the documents provided nor was the facility's address or EPA I.D. number.
- Transformer number 6 on the facility's "Disposal and Monitoring Report" was identified by nameplate as a capacitor. This "transformer" was not inspected quarterly for leaks along with the other transformers.
- Unique Manifest Numbers were not listed on Annual Documents, disposal references for capacitors only.
- Records were missing kilograms of PCBs, unique identification numbers for PCB containers as well as PCB

container disposal not listed (including PCB capacitors in drums, debris from 1989 PCB capacitor spill cleanup, and retrofill liquids).

- Total weights of PCB articles and PCBs in kilograms remaining in service at the end of calendar year were missing from the records.

- Total weight in kilograms of PCB transformers remaining in service at the end of the calendar year were missing from records.

- Total number of PCB capacitors remaining in service at the end of the calendar year were missing from records.

40 CFR Section 761.205: Notification of PCB Activity

Failure to notify U.S. EPA by filing form 7710-53. Facility stored PCB capacitors which, according to manifest #AT1SM dated 4/4/91 and continuation sheet, were stored more than 30 days.

40 CFR Section 761.211: Unmanifested PCB shipment

Proper generator identification number not used for shipment of nineteen drums of PCB capacitors dated 4/4/91 Manifest #AT1SM.

40 CFR Section 761.125(c)(5): Spill Cleanup Documentation:

Facility failed to provide cleanup documentation of PCB capacitor fluid spill in their Main substation (discovered during a PCB inspection in 1989). Inspectors during the 1989 PCB inspection discovered PCBs at 69,000 ppm in the substation and indicated to the facility to clean up the contamination to 25 ppm PCB and to maintain documentation on the cleanup (refer to correspondence letter dated July 21, 1989 in Attachment F).

In addition, the facility failed to cooperate with the inspectors during the inspection including but not limited to: failing to sign the third page of the Field Citation and failure to respond to the Field Citation.

REPORT ON INSPECTION TO DETERMINE
COMPLIANCE WITH THE PCB DISPOSAL
AND MARKING REGULATIONS

MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OHIO 43302

NOVEMBER 30 AND DECEMBER 1, 1992

PERFORMED BY:

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF EMERGENCY AND REMEDIAL RESPONSE
P.O. BOX 1049, 1800 WATERMARK DRIVE
COLUMBUS, OHIO 43266-0149

AS AUTHORIZED UNDER THE
U.S. EPA PILOT TSCA COOPERATIVE
ENFORCEMENT AGREEMENT PROGRAM

PCB COMPLIANCE INSPECTION REPORT

I. OBJECTIVES

The inspection was conducted to document the facility's handling, storage and disposal practices and to determine its compliance with the PCB Regulations, 40 CFR Part 761, as published in the Federal Register of May 31, 1979 and as amended.

II. COMPANY IDENTIFICATION

Marion Steel Company
912 Cheney Avenue
Marion, Ohio 43302
(614) 383-4011

Parent Company: None
President: James R. Conway

Responsible Official

Scott D. Conway, Plant Manager

III. DATE OF INSPECTION

November 30, 1992 and December 1, 1992

IV. PARTICIPANTS

Company

Scott Conway, Plant Manager

Ohio EPA

Charlotte E. Hammar, Environmental Specialist I (author)
Thomas P. Buchan, Environmental Specialist II

V. COMPANY BACKGROUND

(X) PCBs () NO PCBs DISCOVERED

Operations: Marion Steel is a small scale steel mill which melts scrap metal to produce billets. End products are steel billets and steel signposts.

Size: 385 Employees. Plant is approximately 800,000 square feet.

Established: 1868 as a steel mill. Was Pollack Steel from 1868 to 1971. Armco Steel from 1971 to 1981. Became Marion Steel in 1981.

Basis For Selection: Marion Steel was included in previous PCB inspections due to its use of PCBs in

hydraulic and electrical equipment. Marion Steel was found to be not in compliance with the Federal PCB regulations in a 1989 compliance inspection. The facility was included in the 1992 Neutral Inspection Scheme as a reinspection.

VI. INSPECTION SUMMARY

Opening Conference

- A. The inspectors met with company officials as indicated in Section II, presented TSCA Inspection Credentials, explained the purpose of the inspection, and presented for signature the TSCA Inspection Forms as indicated below:

- (X) Notice of Inspection
- (X) TSCA Confidentiality Notice
- (X) Receipt for Samples/Documents collected

These documents are enclosed as Attachment A and were signed by Scott Conway, Plant Engineer.

B. Circumstances Applicable to this Inspection

- | | |
|-----------------------|------------------------|
| (X) Disposal | () Processing |
| (X) Marking | () Distribution |
| () Storage | (X) Use/Authorizations |
| () Manufacturing | (X) Recordkeeping |
| (X) Notification | (X) Manifesting |
| () None of the above | |

C. Citation

- () Not Applicable
- (X) Citation issued on December 1, 1992
- (X) Response received on December 29, 1992

D. Closing Conference

- (X) The inspectors explained the three possible outcomes of the inspection and informed the company officials that a final determination and notification would be made by the Regional Office.

VII. ATTACHMENTS

- A. Notice of Inspection
TSCA Inspection Confidentiality Notice
Receipt for Samples/Documents
- B. Sample Results

- C. Facility Documents
- D. Field Citation and Facility Response
- E. Photographs
- F. Correspondence

VIII. INSPECTOR'S COMMENTS

☒ Disposal ☒ Marking ☒ Use/Authorizations
 ☐ Storage ☒ Recordkeeping ☐ Manufacturing/
 Processing ☐ Distribution ☒ Manifesting ☒
 Notification ☒ Other (spills)

At the time of inspection the Plant Manager of the facility, Scott Conway, supplied the inspectors with a "Disposal and Monitoring Report" on the facility's PCBs. The facility did not have PCB Annual Documents on hand for 1989, 1990, 1991 or previous years (1983 through 1988). Two copies of the "Disposal and Monitoring Report" can be found in Attachment C. According to the title page, both documents were revised in April, 1992. In addition, a document titled "Capacitors" lists the PCB capacitors located in the Main Substation and the dates these capacitors were disposed. According to Mr. Conway, no PCB capacitors remained in the Main Substation at the time of inspection. These three documents (the two Disposal and Monitoring Reports and the Capacitors document) are located in Attachment C and were used to determine the PCB inventory at the facility. Some discrepancies were noted by the inspector in these documents.

The "Disposal and Monitoring Report" dated April, 1990 indicates there were forty-four (44) large PCB capacitors in service in the Mill Substation and the A and B Furnace Switchgear. This document also indicates that six large, PCB capacitors were disposed June 30, 1990 from the A and B Furnace Switchgear. This document does not list disposal of three large PCB capacitors from the Main Substation in 1990. According to the April, 1990 "Disposal and Monitoring Report", the facility had six PCB-nameplated transformers in service, one PCB-contaminated transformer (160 ppm PCB) and one tested non-PCB transformer.

Mr. Conway indicated there were about thirty additional oil-filled transformers in service at the facility for which test results were not available.

At the time of inspection, the inspectors viewed the facility's six PCB transformers which are listed below:

<u>TYPE/SERIAL #</u>	<u>GALLONS/FLUID</u>	<u>M, TRANS/ACCESS</u>	<u>DIKE</u>
G.E./11-885865	112/PYRANOL	YES/YES	NO
WEST./YBR83871	195/INERTEEN	YES/YES	NO
WEST./YBR83872	195/INERTEEN	YES/YES	NO
G.E./H-884638	243/PYRANOL	YES/YES	NO
* G.E./H-887303	156/PYRANOL	YES/YES	NO
** WEST./174C985A02	0.94/INERTEEN	YES/YES	NO

* Inspectors observed that the facility was storing a cardboard box within three feet of this PCB transformer, however, it was removed by Mr. Conway at the time of inspection.

** This transformer was identified as a capacitor on the nameplate.

Quarterly PCB transformer inspection records were required of the facility and were provided at the time of inspection, however, according to the "Disposal and Monitoring Report", Westinghouse serial number 1213025 Inerteen transformer (229 gallons) was indicated as being disposed August 1, 1989. The manifest for this transformer, Manifest Document number 0570M dated August 1, 1989, is located in Attachment C along with the quarterly transformer inspection records. According to the quarterly inspection records, Westinghouse transformer serial number 1213025 was inspected up through May 10, 1991 (over a year after it was "disposed"). Therefore, either the "Disposal and Monitoring Report" document or the quarterly inspection records are inaccurate. In addition, one transformer identified on the "Disposal and Monitoring Report", type "PP" transformer serial number 72111547, was located in the Main substation. The inspectors viewed what Mr. Scott Conway identified as the transformer, however, it was nameplated serial number 174C985A02 and identified on the nameplate as a capacitor. Facility representatives believed it was a transformer. This unit was not included in the facility's quarterly transformer inspection records. Therefore, either the "Disposal and Monitoring Report" is inaccurate as listing this unit as a transformer, or the quarterly PCB transformer inspection reports are inaccurate (missing inspection of this unit).

The facility had registered it's PCB transformers with the local fire department (documentation in previous report).

According to previous PCB inspections and facility records, the facility had once used PCBs in eleven of it's hydraulic

units. According to historical records, the facility had decontaminated the units prior to 1979. Two samples were taken of debris surrounding the "A Furnace Hydraulic Unit" and the "B Furnace Hydraulic Unit". Results indicate these samples were non-PCBs.

A PCB Inspection was conducted at the facility July 7, 1989. At that time the inspector took a sample of a two foot by three foot oil stained area in the Main Substation below the South capacitor bank. Sample results indicated 86,000 ppm PCB. The inspector sent a letter to the facility dated July 21, 1989 (Attachment F) which indicated what the sample results were and instructed the facility to clean the contamination to 25 ppm PCBs. The facility was instructed in this letter to follow the National Spill Policy in the PCB regulations and document the spill cleanup. The facility removed two drums of soil and took follow-up samples. According to the facility's sample results, contamination remained in the substation at 1,360 and 4,500 ppm PCBs respectively. The facility questioned it's sample results because a different aroclor of PCBs was identified. The inspectors returned to the facility August 31, 1989 and took an additional sample. The sample indicated contamination still existed at 210 ppm PCBs. The facility was instructed to remove additional soil.

At the time of inspection Mr. Conway was asked if he had cleanup documentation on the PCB capacitor spill discovered in 1989. No documentation was available on the spill cleanup. The facility supplied the inspector with a manifest for the two drums of initially removed soil (identified as "drums of debris" (manifest document number 0570M dated 8/1/89). The inspectors asked Mr. Conway if additional soil was removed from the spill area. Mr. Conway indicated that if that is what was required than that is what the facility did, however, Mr. Conway did not know how much additional soil was removed and did not have follow-up sample results to document this. The inspectors asked Mr. Conway if he had a manifest for the additional drums(s) of soil. Mr. Conway indicated that manifest document number AT15M dated April 4, 1991 contained debris from the capacitor cleanup. This manifest, however, indicates fifteen drums of capacitors and four drums of solids (clothing) were disposed. The continuation sheet certified by Marion Steel personnel indicates that the drums contained capacitors. The inspectors indicated that if this manifest included the cleanup debris from the capacitor spill, than it would have been stored greater than one year. Mr. Conway claimed that Kelly Sherman of the Ohio EPA "told him that it was alright to do that".

The facility was not storing any PCBs or PCB items at the time of inspection and was not maintaining a PCB storage area. The

facility had stored PCB items in the past. Among these were nineteen drums of PCB capacitors which had been taken out of service January 31, 1991 and disposed April 4, 1991 (see manifest document number AT15M). According to Scott Conway, the facility had not notified U.S. EPA of it's PCB activity by filing form 7710-53. In addition, the facility had improperly manifested this shipment of PCBs by using an unauthorized EPA Identification Number on the manifest.

A Field Citation was issued to the facility for:

- Missing and/or incomplete Annual PCB Document Logs. The facility had incomplete logs for 1990 and 1991 and was missing the 1989 Annual PCB Document Log altogether.
- Failure to maintain a PCB cleanup document on a PCB capacitor spill discovered in 1989.
- Failure to notify U.S. EPA of it's PCB activity by filing EPA form 7710-53. This notification was required because the facility had stored PCB capacitors for more than thirty days and was maintaining a PCB storage area subject to the PCB storage regulations in 40 CFR 761.65.
- Improperly manifesting a shipment of PCB capacitors by using an unauthorized Identification Number on the manifest (manifest document number AT15M).

Mr. Scott Conway refused to acknowledge receipt of the Field Citation by signing the third page which explains what measures the facility must take to be in compliance with the PCB regulations. The inspectors left a copy of the Field Citation with Mr. Scott Conway. Ohio EPA received a response to the Field Citation. The inspector sent a Certified letter to Marion Steel Company with comments on the facility's response (Attachment F).

Charlotte E. Hammer 1-12-93
Inspector's Signature Date

ATTACHMENT A



United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act
NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Time	3. Firm Name
Date 11-30-92	Inspector No. OH-025	Daily Seq. No. 02	1545	Marion Steel Company
4. Inspector Address Ohio Environmental Protection Agency 1800 WaterMark Drive/P.O. Box 1049 Columbus, Ohio 43226-0149				5. Firm Address 912 Cheney Ave. Marion, Ohio 43302

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature <i>Charlotte E. Hammar</i>		Recipient Signature <i>Scott D. Conway</i>	
Name CHARLOTTE E. HAMMAR		Name SCOTT D. CONWAY	
Title ENV. SPECIALIST	Date Signed 11-30-92	Title P.T. MGR	Date Signed 11/30/92



United States Environmental Protection Agency
Washington, D.C. 20460

Toxic Substances Control Act

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

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1. Investigation Identification			2. Firm Name
Date 11-30-92	Inspector No. OH-025	Daily Seq. No. 02	Marion Steel Company
3. Inspector Name Charlotte E. Hammar			4. Firm Address 912 Cheney Ave. Marion, Ohio 43302
5. Inspector Address Ohio Environmental Protection Agency 1800 WaterMark Drive/P.O. Box 1049 Columbus, Ohio 43226-0149			6. Chief Executive Officer Name Scott Conway
			7. Title Plant Mgr.

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

Emma Avant
U.S. EPA Region V SP-14J
77 West Jackson Boulevard
Chicago, Illinois 60604

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of the Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice.

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Name
Name Scott D. Conway	Title
Title PLT. MGR.	Date Signed 11/30/92
Address	



United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act
RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Firm Name
Date 12-1-92	Inspector No. 04-035	Daily Seq. No. 01	Marion Steel Company
3. Inspector Address Ohio Environmental Protection Agency 1800 WaterMark Drive/P.O. Box 1049 Columbus, Ohio 43226-0149			4. Firm Address 912 Cheney Avenue Marion, Ohio 43302

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt of the document(s) and/or sample(s) described is hereby acknowledged:

No.	Description
Samples:	
01	Debris surrounding B Furnace Hydraulic
02	Debris surrounding A Furnace Hydraulic
03	Photographs of A and B Furnace Hydraulics
04	Transformer oil PCB test results (1 page) SUBCHIO 9/12/88
05	Certificate of Destruction, Cover Letter and Detail Report for PCB Capacitors and debris dated Dec. 4, 1991
06	Certificate of Destruction, Cover Letter and Detail Report for PCB Capacitors dated March 25, 1991
07	Sub Station Caps dated January 11, 1991 - list of PCB capacitors that were disposed (one page).
08	Manifest, Cover Letter and 2 Continuation Sheets on 15 drums of Capacitors and 4 drums debris dated 4/16/91 manifest AT 15 M
09	Certificate of Destruction & Manifest dated 11/22/90 for transformer oil.
10	PCB Contaminated Transformer Quarterly Inspection Reports.

Optional:

Duplicate or split samples: Requested and Provided ☒ Not Requested ☐

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature <i>Charlotte E. Hammar</i>		Recipient Signature <i>Scott D. Lowmyer</i>	
Name CHARLOTTE E. HAMMAR		Name SCOTT D. LOWMYER	
Title ENV. SPECIALIST	Date Signed 12-1-92	Title PLT. MGR.	Date Signed 12/1/92



United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act
RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

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The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt of the document(s) and/or sample(s) described is hereby acknowledged:

No.	Description
01	PCB Quarterly Inspections - 11/26/91 - 9/28/92
02	Main Sub Cap PCB Capacitor Inventory - 6 pages
03	Certificate of Destruction - #0903530 (3/22/91) - #0903530 (1/15/91)
04	Certificate of Disposal #8351 (10/25/89); Manifest #0570M (8/1/89) with EMC cover letter (11/10/89)
05	Disposal and Monitoring Report PCB - revised 4/21/92 (1991 PCB Annual Document)
06	Disposal + Monitoring Report PCBs - revised 4/21/92 (1990 PCB Annual Document)

Optional:

Duplicate or split samples: Requested and Provided ☐ Not Requested ☒ No Samples Taken

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature <i>Charlotte E. Hamman</i>		Recipient Signature <i>Scott D. Conway</i>	
Name CHARLOTTE E. HAMMAN		Name SCOTT D. CONWAY	
Title ENV. SPECIALIST	Date Signed 11-30-92	Title PLT MGR.	Date Signed 11/30/92

ATTACHMENT B

KEMRON ENVIRONMENTAL SERVICES
109 STARLITE PARK
MARIETTA, OHIO 45750

Phone: (614) 373-4071

Ohio EPA DERR-PCB Group
P.O. Box 1049
1800 Watermark Dr
Columbus, Ohio 43266-0149
Attn: Charlotte Hammar

Purchase Order: 404654/081292
Invoice Number:

Order #: N2-12-104
Date: 12/23/92 13:41
Work ID: P921201/Marion Steel Co.
Date Received: 12/04/92
Date Completed: 12/23/92

Client Code: OEPP_56664

SAMPLE IDENTIFICATION

Sample Number	Sample Description
01	P921201-01

Sample Number	Sample Description
02	P921201-02

ANALYTICAL METHODS AND DOCUMENTATION ARE FOUND AT THE END OF
THIS REPORT. ALL RESULTS ON SOILS/SLUDGES ARE REPORTED
"AS RECEIVED" UNLESS OTHERWISE SPECIFIED.

Maren M Burchfield
Certified By
Maren M. Burchfield

Order # N2-12-104
12/23/92 13:41

KEMRON ENVIRONMENTAL SERVICES
TEST RESULTS BY SAMPLE

Page 2

Sample: 01A P921201-01

Collected: 12/01/92 Category: SOLID

Test Description
Percent Solids

Result
45

Det Limit
1

Units
% wt.

Analyzed
12/08/92

By
MDC

Sample: 02A P921201-02

Collected: 12/01/92 Category: SOLID

Test Description
Percent Solids

Result
68

Det Limit
1

Units
% wt.

Analyzed
12/08/92

By
MDC

Order # N2-12-104
12/23/92 13:41

KEMRON ENVIRONMENTAL SERVICES
TEST RESULTS BY SAMPLE

Page 3

Sample Description: P921201-01

Test Description: Polychlorinated Biphenyls Collected: 12/01/92 13:00 Method: 8080
Test Code: PCB_S Lab No: 01A Category: SOLID

ANALYST: ECL EXTRACTED: 12/08/92 FILE #: 011F0101 UNITS: ug/kg VERIFIED: RJW
INSTRMT: HP_IV INJECTED: 12/22/92 FACTOR: 165

CAS#	COMPOUND	RESULT	DET LIMIT
12674-11-2	Aroclor-1016	BDL	83
11104-28-2	Aroclor-1221	BDL	83
11141-16-5	Aroclor-1232	BDL	83
53469-21-9	Aroclor-1242	BDL	83
12672-29-6	Aroclor-1248	1300	83
11097-69-1	Aroclor-1254	BDL	160
11096-82-5	Aroclor-1260	BDL	160

SURROGATES

Decachlorobiphenyl	72 % Recovery
2,4,5,6-tetrachloro-m-xylene	52 % Recovery

NOTES AND DEFINITIONS FOR THIS SAMPLE

DET LIMIT = DETECTION LIMIT

BDL=BELOW DETECTION LIMIT

NA =NOT ANALYZED

Sample Description: P921201-02 Collected: 12/01/92 13:10 Method: 8080
Test Description: Polychlorinated Biphenyls Test Code: PCB_S Lab No: 02A Category: SOLID

ANALYST: ECL EXTRACTED: 12/08/92 FILE #: 012F0101
INSTRMT: HP_IV INJECTED: 12/22/92 FACTOR: 66 UNITS: ug/kg VERIFIED: RJW

CAS#	COMPOUND	RESULT	DET LIMIT
12674-11-2	Aroclor-1016	BDL	33
11104-28-2	Aroclor-1221	BDL	33
11141-16-5	Aroclor-1232	BDL	33
53469-21-9	Aroclor-1242	BDL	33
12672-29-6	Aroclor-1248	2400	33
11097-69-1	Aroclor-1254	BDL	66
11096-82-5	Aroclor-1260	BDL	66

SURROGATES
Decachlorobiphenyl 114 % Recovery
2,4,5,6-tetrachloro-m-xylene 52 % Recovery

NOTES AND DEFINITIONS FOR THIS SAMPLE

DET LIMIT = DETECTION LIMIT

BDL=BELOW DETECTION LIMIT

NA =NOT ANALYZED

Order # N2-12-104
12/23/92 13:41

KEMRON ENVIRONMENTAL SERVICES
TEST METHODOLOGIES

Page 5

Percent Solids

EPA Method 160.3 - Gravimetric, Dried at 103-105 Degrees C
To convert test results to "Dry Weight Basis" use this formula:

$$\text{RESULT (DRY WT.)} = \frac{\text{RESULT (REPORTED)} \times 100}{\text{PERCENT SOLIDS}}$$

EPA Method 8080 (SW-846)

CHAIN-OF-CUSTODY RECORD

[illegible]

*Homogenize all composite samples prior to analysis

ATTACHMENT C

DISPOSAL & MONITORING REPORT OF
POLYCHLORINATED BIPHENYLS (PCBS)

LOCATED AT:

THE MARION STEEL COMPANY

REPORT REVISED APRIL 21, 1992

PREPARED BY: SCOTT CONWAY

1. Equipment Name: Main Sub Station (East Side)
Manufacturer: Westinghouse
Serial Number: 293707
Description: Transformer - 3 Phase
HV = 138,000
LV = 13800/7970
20/26.6/33 MVA

Description of PCB Fluid:

A. Brand Name Oil *
B. Gallons 5000
C. Pounds 57,000

* NOTE: Oil is contaminated with PCB 77 PPM/
On 11/23/90 S.D. Meyer retrofilled this transformer
to less than 2 PPM. This transformer subsequently failed
on 12/15/90.

Date Purchased or Placed In Service: 1967
Date Removed from service: 12/15/90

Disposal Information: On 3/91 oil was removed by S. D. Meyer
from transformer and properly disposed
of. The transformer is presently
stored in a covered warehouse.

2. Equipment Name: Main Sub Station (West Side)

Manufacturer: Westinghouse

Serial Number: FLR 47281

Description: Transformer - 3 Phase

HV = 138,000

LV = 13800/7970

7500 KVA 55 C Rise

8400 KVA 65 C Rise

7.5 MVA

Description of PCB Fluid:

A. Brand Name Oil *

B. Gallons 3440

C. Pounds 25800

* NOTE: Oil is PCB contaminated with 160 PPM

Date purchased or placed in service: 1967

Date removed from service:

Disposal information:

3. Equipment Name: #2 Unit (East) Melt Shop Substation
("B" Furnace)

Manufacturer: Pennsylvania

Serial Number: 55466-1

Description: Transformer - 3 Phase

Voltage Rating 13800-375

KVA - 18750

185 MVA

Description of PCB Fluid:

A. Brand Name Oil

B. Gallons 3850

C. Pounds 28750

35 PPM 5/5/89, Infotest,

35 PPM 8/17/88 Sunohio,

L 2 PPM S. D. Meyer 11/22/90

Date purchased or placed in service: 1976

Date removed from service:

Disposal information:

4. Equipment Name: #2 Unit (East) Melt Shop Sub Station
Manufacturer: Westinghouse
Serial Number: YBR-83872
Description: Transformer
Voltage Rating 13800 - 480
Full Load Cont. 1000 KVA - 65° C Rise

Description of PCB Fluid:

A. Brand Name	Intereen
B. Gallons	195
C. Pounds	2262

Date purchased or placed in service: 1967

Date removed from service:

Disposal information:

5. Equipment Name: #1 Unit (West) Melt Shop Sub Station
Manufacturer: Westinghouse
Serial Number: YBR-83871
Description: Transformer
Voltage Rating 13800 - 480
Full Load Cont. 1000 KVA - 65° C Rise

Description of PCB Fluid:

A. Brand Name Inerteen
B. Gallons 195
C. Pounds 2265

Date purchased or placed in service: 1967

Date removed from service:

Disposal information:

6. Equipment Name: Bag House Sub Station

Manufacturer: General Electric

Serial Number: H-884638

Description: Transformer

Voltage Rating 13800 - 2400

KVA Rating 2000 Cont. 55° C Rise Self-Cooled

KVA Rating 2240 Cont. 65° C Rise Self-Cooled

KVA Rating 2576 Cont. 65° C Rise
Future Forced Air

Description of PCB Fluid:

A. Brand Name Pyranol

B. Gallons 243

C. Pounds 3180

Date purchased or placed in service: 1976

Date removed from service:

Disposal information:

7. Equipment Name: Maintenance Building Sub Station
Manufacturer: General Electric
Serial Number: H-885865
Description: Transformer

Voltage Rating 13800 - 480

KVA Rating 500 Contr. 65° C Rise
Self-Cooled

Description of PCB Fluid:

A. Brand Name Pyranol

B. Gallons 112

C. Pounds 1450

Date purchased or placed in service: 1977

Date removed from service:

Disposal information:

8. Equipment Name: Mill Building 480 V Sub Station
Manufacturer: General Electric
Serial Number: H-887303
Description: Air-Cooled Transformer

Voltage Rating 13800 - 480
KVA Rating 1000 Cont. 65° C Rise
Self-Cooled
KVA Rating 1150 Cont. 65° C Rise
Future Forced Air

Description of PCB Fluid:

A. Brand Name	Pyranol
B. Gallons	156
C. Pounds	2030

Date purchased or placed in service: 1975

Date removed from service:

Disposal information:

9. Equipment Name: Main Substation
Manufacturer: Westinghouse Type PP Transformer
Serial Number: 721111547
Description (5 KVA Transformer for fans on 50 MVA
Furnace Transformer)
Rated Voltage 240 KVAR 2.5

Description of PCB Fluid:

A. Brand Name Inerteen
B. Gallons .94
C. Pounds 10.7

Date purchased or placed in service: 1976

Date removed from service:

Disposal information:

CAPACITORS

Page 1 of 3

Description: 2300 V Substation (Mill) South Cabinet
 Westinghouse Inerteen Cap.
 Type FP Voltage Rating 2400
 Style 1418581 G 15 KVA C

Description of PCB Fluid:

A. Brand Name Inerteen
 B. Gallons 1.72) per Westinghouse Corporation
 C. Pounds 19.58)

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
	Test No.					
1	50B525 UU		1955	Top		
2	50B507 UU		1955	Top		
3	50B506 UU		1955	Top		
4	50B515 UU		1955	Top		
5	50B516 UU		1955	Top		
6	50B532 UU		1955	Top		
7	50B531 UU		1955	Bottom		
8	50B533 UU		1955	Bottom		
9	50B534 UU		1955	Bottom		
10	50B513 UU		1955	Bottom		
11	50B514 UU		1955	Bottom		
12	50B523 UU		1955	Bottom		

CAPACITORS

Page 2 of 3

Description:

2300 V Substation (Mill) Middle Cabinet
 Westinghouse Inerteen Cap.
 Type FP Voltage Rating 2400
 Style 1418581 G

Description of PCB Fluid:

A. Brand Name Inerteen
 B. Gallons 1.72) per Westinghouse Corporation
 C. Pounds 19.58)

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
	Test No.					
1	50B528 UU		1955	Top		
2	50B510 UU		1955	Top		
3	50B512 UU		1955	Top		
4	50B424 FF		1955	Top		
5	50B522 UU		1955	Top		
6	50B529 UU		1955	Top		
7	50B517 UU		1955	Bottom		
8	50B508 UU		1955	Bottom		
9	50B504 UU		1955	Bottom		
10	50B509 UU		1955	Bottom		
11	50B521 UU		1955	Bottom		
12	50B526 UU		1955	Bottom		

CAPACITORS

Page 3 of 3

Description: 2300 V Substation (Mill North Cabinet
Westinghouse Inerteen cap.
Type FP Voltage Rating 2400 KVAR 5 - 1
Style 1418585 G

Description of PCB Fluid:

A. Brand Name Inerteen
B. Gallons 1.72) per Westinghouse Corporation
C. Pounds 19.58)

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
	Test No.					
1	51J108 2X		1955			
2	50E773 EF		1955			
3	50E763 EF		1955			
4	50E749 EF		1955			
5-12	50 Series		1955			

CAPACITORS

Description: "B" Furnace Switch Gear Capacitors (Upper)
Westinghouse Inerteen Cap.
Style No. 175C002A 54B
KVAC 100 Voltage Rating 14,400 95 KV B1L
Type DV

Capacitor Can Size W = 13 1/2
 H = 19 1/4
 Thick = 4

Description of PCB Fluid:

A. Brand Name	Inerteen
B. Gallons	2.65
C. Pounds	30.14

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Out Of Service</u>	<u>Disposal Date</u>
1	71070111		9/80	Upper		
2	71070112		9/80	Upper		
3	71071933		9/80	Upper		

PCB = 11.4 Lbs./Gal.

Multiply external cubin in. of can by .029
to obtain lbs. of PCB in capacitor.

```
.029 if manufacturer before 1970
.029 if manufacturer after 1970
```


CAPACITORS

Description: "A" Furnace Switch Gear Capacitors (Upper)
Westinghouse Inerteen Cap.

(Capacitor Can Size: W = 13 1/2)
 H = 19 3/4)
 Thick = 4

Description of PCB Fluid:

A. Brand Name Inerteen
B. Gallons 2.65
C. Pounds 30.14

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
1	No name plate		9/80	Upper		
2	No name plate		9/80	Upper		

PCB = 11.4 Lbs./Gal.

Multiply external cubic in. of can by .029
to obtain lbs. of PCB in capacitor.

.029 if manufacturer before 1970
.021 if manufacturer after 1970

CAPACITORS

Description: "A" Furnace Switch Gear Capacitor (Upper)
Westinghouse Dyna-Vac Cap.
Style 175C002A 54B
Type PB 1TVAC 100 14400 Volt
B1LK V - 95

Description of PCB Fluid:

A. Brand Name Inerteen
B. Gallons 2.73
C. Pounds 31.122

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
3	7107-0113		9/80	Upper		

DISPOSAL & MONITORING REPORT OF

POLYCHLORINATED BIPHENYLS (PCBS)

LOCATED AT:

MARION STEEL COMPANY

Revised APRIL 21, 1992
REPORT ~~PREPARED JULY 31, 1986~~

PREPARED BY SCOTT LOWMY
~~DESTROY ON JULY 2, 1987~~

~~AFTER JULY 1, 1987, REPORT IS
PREPARED~~

APRIL 1990

~~SC 7/21/89~~

5. Equipment Name: Main Sub Station (East Side)

Manufacturer: Westinghouse

Serial Number: 293707

Description:

Transformer - 3 Phase

HV = 138,000

LV = 13800/7970

20/26.6/33 MVA

Description of PCB Fluid:

A. Brand Name Oil *

B. Gallons 5000

C. Pounds 57,000

*NOTE: Oil Is Contaminated With PCB 77PPM / ON 11/23/90 SOMEONE retrofilled
THIS TRANSFORMER TO LESS THAN 2 PPM. THIS TRANSFORMER
SUBSEQUENTLY FAILED ON 12/15/90.

Date Purchased or Placed In Service: 1967

Date Removed From Service: 12/15/90

Disposal Information: ON 3/91 OIL WAS REMOVED FROM TRANSFORMER
AND PROPERLY DISPOSED OF. THE TRANSFORMER IS PRESENTLY
STORED IN A COVERED WAREHOUSE.

✓
16. Equipment Name: Main Sub Station (West Side)
Manufacturer: Westinghouse
Serial Number: FLR 47281
Description:

Transformer - 3 Phase

HV = 138,000

LV = 13800/7970

7500 KVA 55 C Rise

8400 KVA 65 C Rise

7.5 MVA

Description of PCB Fluid:

A. Brand Name	Oil*
B. Gallons	3440
C. Pounds	25800

*NOTE: Oil Is PCB Contaminated With 160 PPM

Date Purchased or Placed In Service: 1967

Date Removed From Service:

Disposal Information:

3
Equipment Name: #2 Unit (East) Melt Shop Substation (B Furnace)

Manufacturer: Pennsylvania

Serial Number: 55466-1

Description:

Transformer - 3 Phase

Voltage Rating 13800-375

KVA - 18750

185 MVA

Description of PCB Fluid:

A. Brand Name Oil

B. Gallons 3850

C. Pounds 28750

X 35 PPM 5/5/89, Infotest, 35 PPM 8/17/88 Sunohio, < 2 PPM SOMER 11/22/9

Date Purchased or Placed In Service: 1976

Date Removed From Service:

Disposal Information:

~~SOMER 11/22/90~~
~~PCB 11/22/90 at < 2 ppm~~

4. Equipment Name: #2 Unit (East) Melt Shop Sub Station
Manufacturer: Westinghouse
Serial Number: YBR-83872
Description:

Transformer

Voltage Rating 13800 - 480

Full Load Cont. 1000 KVA - 65 C Rise

Description of PCB Fluid:

A. Brand Name	Intereen
B. Gallons	195
C. Pounds	2262

Date Purchased or Placed In Service: 1967

Date Removed From Service:

Disposal Information:

5. Equipment Name: #1 Unit (West) Melt Shop Sub Station

Manufacturer: Westinghouse

Serial Number: YBR-83871

Description:

Transformer

Voltage Rating 13800 - 480

Full Load Cont. 1000 KVA - 65° C Rise

Description of PCB Fluid:

A. Brand Name Inerteen

B. Gallons 195

C. Pounds 2262

Date Purchased or Placed in Service: 1967

Date Removed From Service:

Disposal Information:

6

8. Equipment Name: Bag House Sub Station

Manufacturer: General Electric

Serial Number: H-884638

Description:

Transformer

Voltage Rating 13800 - 2400

KVA Rating 2000 Cont. 55 C Rise Self-Cooled

KVA Rating 2240 Cont. 65 C Rise Self-Cooled

KVA Rating 2576 Cont. 65 C Rise Future Forced Air

Description of PCB Fluid:

A. Brand Name Pyranol

B. Gallons 243

C. Pounds 3180

Date Purchased or Placed in Service: 1976

Date Removed From Service:

Disposal Information:

7/9. Equipment Name: Maintenance Building Sub Station

Manufacturer: General Electric

Serial Number: H-885865

Description:

Transformer

Voltage Rating 13800 - 480

KVA Rating 500 Contr. 65° C Rise Self-Cooled

Description of PCB Fluid:

A. Brand Names Pyranol

B. Gallons 112

C. Pounds 1450

Date Purchased or Placed in Service: 1977

Date Removed From Service:

Disposal Information:

~~SECRET~~

3 d Equipment Name: Mill Building 480 V Sub Station

Manufacturer: General Electric

Serial Number: H-887303

Description:

Air Cooled Transformer

Voltage Rating 13800 - 480

KVA Rating 1000 Cont. 65 C Rise Self-Cooled

KVA Rating 1150 Cont. 65 C Rise Future Forced Air

Description of PCB Fluid:

A. Brand Name Pyranol

B. Gallons 156

C. Pounds 2030

Date Purchased or Placed In Service: 1975

Date Removed From Service:

Disposal Information:

~~SC 7/21/89~~

~~CONFIDENTIAL~~

1

Description:

EQUIPMENT NAME : MAIN SUBSTATION

Westinghouse Type PP ~~Capacitor~~ TRANSFORMER
MANUFACTURER;

1 7 (5 KVA Transformer for Fans on ⁵⁰~~33.3~~ MVA Furnace Transformer)

SERIAL NUMBER: 72111547

2 Rated Voltage 240 KVAR 2.5

(~~Located in Main Sub Station~~)

DESCRIPTION :

Description of PCB Fluid:

A. Brand Name Inerteen

B. Gallons .94

C. Pounds 10.7

No.	Serial No.	Purchase Date	Date In Service	Bank	Date Out Of Service	Disposal Date
1	72111547		1976		1977	

DATE PURCHASED OR PLACED IN SERVICE : 1976

DATE REMOVED FROM SERVICE

DISPOSAL INFORMATION

* ~~This unit in place on equipment. Not in operation.~~

~~SC 4/21/80~~

CAPACITORS

Page 1 of 3

Description:

2300 V Sub Station (Mill) South Cabinet

Westinghouse Inerteen Cap.

Type FP Voltage Rating 2400

Style 1418581 G 15 KVA C

Description of PCB Fluid:

A. Brand Name Inerteen

B. Gallons 1.72) Per Westinghouse Corporation

C. Pounds 19.58)

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
	Test No.					
1	50B525 UU		1955	Top		
2	50B507 UU		1955	Top		
3	50B506 UU		1955	Top		
4	50B515 UU		1955	Top		
5	50B516 UU		1955	Top		
6	50B532 UU		1955	Top		
7	50B531 UU		1955	Bottom		
8	50B533 UU		1955	Bottom		
9	50B534 UU		1955	Bottom		
10	50B513 UU		1955	Bottom		
11	50B514 UU		1955	Bottom		
12	50B523 UU		1955	Bottom		

CAPACITORS

Page 2 of 3

Description:

2300 V Sub Station (Mill) Middle Cabinet

Westinghouse Inerteen Cap.

Type FP Voltage Rating 2400

Style 1418581 G

Description of PCB Fluid:

A. Brand Name Inerteen

B. Gallons 1.72) Per Westinghouse Corporation

C. Pounds 19.58)

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
	Test No.					
1	50 B 528 UU		1955	Top		
2	50 B 510 UU		1955	Top		
3	50 B 512 UU		1955	Top		
4	50 B 424 FF		1955	Top		
5	50 B 522 UU		1955	Top		
6	50 B 529 UU		1955	Top		
7	50 B 517 UU		1955	Bottom		
8	50 B 508 UU		1955	Bottom		
9	50 B 504 UU		1955	Bottom		
10	50 B 509 UU		1955	Bottom		
11	50 B 521 UU		1955	Bottom		
12	50 B 526 UU		1955	Bottom		

CAPACITORS

Page 3 of 3

Description:

2300 V Sub Station (Mill) North Cabinet

Westinghouse Inerteen Cap.

Type FP Voltage Rating 2400 KVAR 5 - 1

Style 1418583 G

Description of PCB Fluid:

A. Brand Name Inerteen
B. Gallons 1.72) Per Westinghouse Corporation
C. Pounds 19.58)

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
	Test No.					
1	51 J 108 2 X		1955			
2	50 E 773 EF		1955			
3	50 E 763 EF		1955			
4	50 E 749 EF		1955			
5-12	50 SERIES		1955			

CAPACITORS

Description: "B" Furnace Switch Gear Capacitors (Upper)

Westinghouse Interteen Cap.

Style No. 175 C 002 A 54 B

KVAC 100 Voltage Rating 14,400 95 KV B1L

Type DV

Capacitor Can Size

W = 13 1/2

H = 19 1/4

Thick = 4

Description of PCB Fluid:

A. Brand Name Inerteen

B. Gallons 2.65

C. Pounds 30.14

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
1	71070111		9-80	Upper		
2	71070112		9-80	Upper		
3	71071933		9-80	Upper		

PCB = 11.4 Lbs./Gal.

Multiply External Cubic In. of Can by .029 to obtain
Lbs. of PCB in Capacitor.

.029 If Mfgr. Before 1970

.029 If Mfgr. After 1970

~~80 7/21/80~~

CAPACITORS

Description:

"A" Furnace Switch Gear Capacitors (Upper)

Westinghouse Inerteen Cap.

(Capacitor Can Size: W = 13 1/2)
 H = 19 3/4)
 Thick = 4)

Description of PCB Fluid:

A. Brand Name Inerteen

B. Gallons 2.65

C. Pounds 30.14

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
1	No Name Plate		9-80	Upper		
2	No Name Plate		9-80	Upper		

PCB = 11.4 Lbs./Gal.

Multiply External Cubic In. of Can by .029 to obtain
Lbs. of PCB in Capacitor.

.029 If Mfgr. Before 1970
.021 If Mfgr. After 1970

CAPACITORS

Description:

"A" Furnace Switch Gear Capacitor (Upper)

Westinghouse Dyna-Vac Cap.

Style 175 C 002 A 54 B

Type PB 1TVAC 100 14400 Volt B1LK V - 95

Description of PCB Fluid:

A. Brand Name Inerteen

B. Gallons 2.73

C. Pounds 31.122

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
3	7107-0113		9-80	Upper		

CAPACITORS

Description: "B" Furnace Switch Gear Capacitors (Lower)

GE Protective Cap.

Model 9 L 18 BC L 101

Voltage 13800

Description of PCB Fluid:

A. Brand Name Pyronol

B. Gallons .5

C. Pounds 5.705

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
1	✓L02 4130		1976	Lower	5/30/80	6/30/80
2	✓L02 4146		1976	Lower	5/30/80	6/30/80
3	✓L02 4124		1976	Lower	5/30/80	6/30/80

CAPACITORS

Description:

"A" Furnace Switch Gear Capacitors (Lower)

GE Protective Capacitor

Model No. 9L18 ACL 101

Voltage - 13800

(Instruction Booklet - GEH 2708)

Description of PCB Fluid:

A. Brand Name Pyronol

B. Gallons .5

C. Pounds 5.705

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>
1	C 54851	✓	1967	Lower	6/5/77	6/5/77
2	C 54862	✓	1967	Lower		3/1/77
3	C 54860	✓	1967	Lower		6/1/77

1. Equipment Name: Mill Building 480V Sub Station
 Manufacturer: Westinghouse
 Serial Number: 1213025
 Description:

Transformer Single Phase
13800 - 460 Volts
250 KVA

Description of PCB Fluid:

A. Brand Name	Inerteen
B. Gallons	229
C. Pounds	1700

Date Purchased or Placed In Service: (Not in Use)

Date Removed From Service Prior to 1981:

Disposal Information: Stored on Site

*8-1-89
of 1213025
EMC
disposed*

CAPACITORS

Description:

#1 Capacitor Bank (North) Main Sub Station

Westinghouse DYNA Vac Cap.

KVAC 200 Voltage Rating 7960 BILKV-95

Type DV

Style No.

Description of PCB Fluid:

A. Brand Name Inerteen

B. Gallons 3.1

C. Pounds 36

1 - 175 C 102 A 26 B
 2 - 175 C 102 A 26 C
 3 - 237 C 200 A 14 B

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>	<u>Style No.</u>
1	7010 2319		1967	Top	8-3-83	8-1-86	1
2	7010 2322		1967	Top	8-3-83	8-1-86	1
3	7209 4532		1967	Top	3/15/91	4/4/91	2
4	7010 2039		1967	Top	"	"	1
5	7010 2034		1967	Top	"	"	1
6	7010 2025		1967	Top	"	"	1
7	7010 2383		1967	Top	"	"	1
8	7010 2076		1967	Top	"	"	1
9	7010 2048		1967	Top	7/31/86	3-30-87	1
10	7010 2316		1967	Top	4-23-86	8-1-86	1
11	7010 2085		1967	Top	7/31/86	3-30-87	1
12	7010 2088		1967	Top	3/15/91	4/4/91	1
13	7010 2033		1967	Top	8-3-83	8-1-86	1
	7010 2037		1967	Top	3/15/91	4/4/91	1

CAPACITORS

Page 2

Description:

#1 Capacitor Bank (North) Main Sub Station

Westinghouse DYNA Vac Cap.

KVAC 200 Voltage Rating 7960 B1LKV - 95

Type DV

Style No.

Description of PCB Fluid:

1 - 175 C 102 A 26 B

A. Brand Name Inerteen

2 - 175 C 102 A 26 C

B. Gallons 3.1

3 - 237 C 200 A 14 B

C. Pounds 36

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>	<u>Style No.</u>
15	7010 2142		1967	Middle ₉	3/15/91	4/4/91	1
16	None PCB						
17	7409 5392		1967	Middle	8-3-83	8-1-86	3
18	7409 1206		1967	Middle	8-3-83	8-1-86	3
19	7010 2057		1967	Middle	4-9-86	8-1-86	1
20	7010 2134		1967	Middle ₁₀	3/15/91	4/4/91	1
21	7010 2333		1967	Middle	9/4/86	3-30-87	1
22	7010 2017		1967	Middle ₁₁	3/15/91	4/4/91	1
23	7010 2087		1967	Middle ₁₂	"	"	1
24	7010 2268		1967	Middle ₁₃	"	"	1
25	7010 2344		1967	Middle ₁₄	"	"	1
26	7010 2326		1967	Middle ₁₅	"	"	1
27	7010 2091		1967	Middle ₁₆	"	"	1
28	7010 2118		1967	Middle ₁₇	"	"	1

CAPACITORS

Page 3

Description:

#1 Capacitor Bank (North) Main Sub Station

Westinghouse DYNA Vac Cap.

KVAC 200 Voltage Rating 7960 BILKV - 95

Type DV

Style No.

Description of PCB Fluid:

A. Brand Name Inerteen

B. Gallons 3.1

C. Pounds 36

1 - 175 C 102 A 26 B

2 - 175 C 102 A 26 C

3 - 237 C 200 A 14 B

<u>No.</u>	<u>Serial No.</u>	<u>Purchase Date</u>	<u>Date In Service</u>	<u>Bank</u>	<u>Date Out Of Service</u>	<u>Disposal Date</u>	<u>Style No.</u>
29	7010 2306		1967	Bottom	8-3-83	8-1-86	1
0	7010 2325		1967	Bottom	8-3-83	8-1-86	1
31	7010 2032		1967	Bottom	8-3-83	8-1-86	1
32	7010 2038		1967	Bottom	3/15/91	4/4/91	1
33	7209 4523		1967	Bottom	"	"	2
34	7010 2069		1967	Bottom	9/16/86	3-30-87	1
35	7010 2197		1967	Bottom	3/15/91	4/4/91	1
36	7010 2040		1967	Bottom	"	"	1
37	7010 2042		1967	Bottom	"	"	1
38	7010 2041		1967	Bottom	"	"	1
39	7010 2152		1967	Bottom	"	"	1
40	7010 2030		1967	Bottom	"	"	1
41	7010 2184		1967	Bottom	"	"	1
42	7010 2137		1967	Bottom	"	"	1

SC 7/21/89

REVISED 4-1-87

CAPACITORS

Description:

#2 Capacitor Bank (South) Main Sub Station

Westinghouse DYNA Vac Cap.

KVAC-200 Voltage Rating 8320 BILKV - 95

* Voltage 7960

+ BILKV - 95 Not listed

** PRIOR TO 1982

Description of PCB Fluid:

Style No.

A. Brand Name Inerteen

B. Gallons 3.72

C. Pounds 42.4

4 - 237 C 200 A 14 C

5 - 237 C 200 A 16 B

6 - 237 C 200 A 16 C

7 - 175 C 102 A 26 B

No.	Serial No.	Purchase Date	Date In Service	Bank	Date Out Of Service	Disposal Date	LOC	Style No.
1	7601 1463		1976	Top	**	**		5
2	7601 0396		1976	Top	**	**		
3	+ * 7010 2336		4-79	Top	**	**		7
4	7601 0393		1976	Top	**	**		6
5	7601 1468		1976	Top	**	**		5
6	7601 0429		1976	Top	12/6/87	11/7/88	ENSCO	6
7	7601 0391		1976	Top	12/3/87	11/7/88	ENSCO	6
8	7601 0394		1976	Top	7/21/88	11/7/88	ENSCO	6
9	7601 0414		1976	Top	12/6/87	11/7/88	ENSCO	6
10	7601 0421		1976	Top ₁₉	3/15/91	4/4/91		6
11	7609 3018		1976	Top ₂₁	3/15/91	4		6
12	7604 1312		1976	Top	12/6/87	11/7/88	ENSCO	6
13	+ * Tag Missing		4-79	Top	**	**		7
14	7601 0407		1976	Top	**	**		6
15	7601 0430		1976	Top	**	**		
16	7601 0402		1976	Top	7/21/88	11/7/88	ENSCO	6

CAPACITORS

Page 2

Description:

#2 Capacitor Bank (South) Main Sub Station

Westinghouse DYNA Vac Cap.

KVAC-200 Voltage Rating 8320 BLKV - 95

* Voltage 7960

** PRIOR TO 1982

Description of PCB Fluid:

Style No.

A. Brand Name Inerteen

4 - 237 C 200 A 14 C

B. Gallons 3.72

5 - 237 C 200 A 16 B

C. Pounds 42.4

6 - 237 C 200 A 16 C

No.	Serial No.	Purchase Date	Date In Service	Bank	Date Out Of Service	Disposal Date	LOC. No.	Style No.
17	* 7606 0673		1976	Middle	**	**		4
18	7601 0413		1976	Middle	**	**		6
19	7601 0397		1976	Middle	**	**		6
20	7601 0398		1976	Middle	5/30/90	6/30/90 RMC		6
21	Contains no PCB			Middle	**	**		
22	* 7601 0388		1976	Middle	12/6/87	11/7/88 ENSCO		6
23	* 7601 0427		1976	Middle	**	**		6
24	7601 0385		1976	Middle	**	**		6
25	Tag Missing		Warning Tag Lists Inerteen		**	**		
26	7601 0387		1976	Middle	12/6/87	11/7/88 ENSCO		6
27	7601 0424		1976	Middle	12/6/87	11/7/88 ENSCO		6
28	7601 0423		1976	Middle	**	**		6
29	7601 0399		1976	Middle	**	**		6
30	Contains no PCB			Middle				
31	7601 0418		1976	Middle	5/30/90	6/30/90 RMC		6
32	7601 0408		1976	Middle	**	**		6

SC 7/21/89

CAPACITORS

Page 3

Description:

#2 Capacitor Bank (South) Main Sub Station

Westinghouse DYNA Vac Cap.

KVAC-200 Voltage Rating 8320 B1LKV - 95

* Voltage 7960

** PRIOR TO 1982

Description of PCB Fluid:

A. Brand Name Inerteen

B. Gallons 3.72

C. Pounds 42.4

Style No.

4 - 237 C 200 A 14 C

5 - 237 C 200 A 16 B

6 - 237 C 200 A 16 C

No.	Serial No.	Purchase Date	Date In Service	Bank	Date Out Of Service	Disposal Date	Style Loc. No.
33	7601 0419		1976	Bottom	5/30/90	6/30/90	ENC 6
34	7601 0428		1976	Bottom	5-7-87	11/7/88	ENSCO 6
35	7601 0409		1976	Bottom	**	**	6
36	7601 0410		1976	Bottom	**	**	6
37	7601 0425		1976	Bottom	12/6/87	11/7/88	ENSCO 6
38	7601 0420		1976	Bottom	**	**	6
39	7601 0426		1976	Bottom	**	**	6
40	7601 0422		1976	Bottom	6-11-87	11/7/88	ENSCO 6
41	7601 1469		1976	Bottom	12/3/87	11/7/88	ENSCO 5
42	7601 1467		1976	Bottom	10/1/87	8/1/86	PCB INC. 5
43	7601 1466		1976	Bottom	12/3/87	11/7/88	ENSCO 5
44	7609 3017		1976	Bottom	**	**	6
45	7601 0386		1976	Bottom	3/1/81	8/1/86	PCB INC 6
46	7601 1465		1976	Bottom	**	**	5
47	7601 1464		1976	Bottom	**	**	5
48	7601 0400		1976	Bottom	5/30/90	6/30/90	ENC 6

P.C.B. CONTAMINATED TRANSFORMER

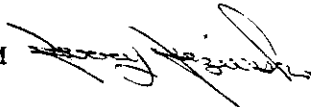
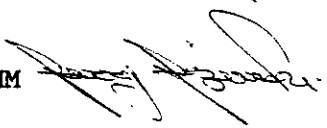
QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PPM	SC OK	7/18/89
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PPM	" OK	"
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	" "	"
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	" "	"
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	" "	"
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	" "	"
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM*	" "	"
8. Baghouse	G.E. H-884638	2,000KVA	1M	" "	"
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	" "	"

* Still in question from EPA.

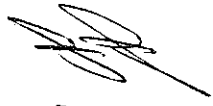

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PMM		10-13-89
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PMM		10-13-89
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	Peter Mahnd	10-11-89
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	P. Mahnd	10-11-89
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	P. Mahnd	10-11-89
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	P. Mahnd	10-11-89
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	P. Mahnd	10-11-89
8. Baghouse	G.E. H-884638	2,000KVA	1M	P. Mahnd	10-11-89
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	P. Mahnd	10-11-89

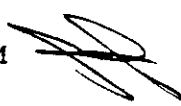

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PPM		1-9-90
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PPM		1-9-90
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	Pm	1-11-90
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	Pm	1-11-90
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	Pm	1-11-90
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	Pm	1-11-90
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	Pm	1-11-90
8. Baghouse	G.E. H-884638	2,000KVA	1M	Pm	1-11-90
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	Pm	1-11-90



P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PMM		4-11-90
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PMM		4-11-90
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	pm	4-12-90
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	pm	4-12-90
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	pm	4-12-90
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	pm	4-12-90
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	pm	4-12-90
8. Baghouse	G.E. H-884638	2,000KVA	1M	pm	4-12-90
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	pm	4-12-90

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

<u>LOCATION</u>	<u>TRANS. MFG./SERIAL #</u>	<u>SIZE</u>	<u>TYPE OIL</u>	<u>INSP. BY</u>	<u>DATE INSPECTED</u>
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PPM		7-2-90
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PPM		7-2-90
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	PM	7-2-90
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	PM	7-2-90
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	PM	7-2-90
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	PM	7-2-90
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	PM	7-2-90
8. Baghouse	G.E. H-884638	2,000KVA	1M	PM	7-2-90
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	PM	7-2-90

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PMM		
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PMM	YJZ (2)	10-18-1990
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	PM ✓	10-19-1990
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	PM ✓	10-19-1990
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	PM ✓	10-19-1990
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	PM ✓	10-19-1990
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	PM ✓	10-19-1990
8. Baghouse	G.E. H-884638	2,000KVA	1M	PM X	10-19-1990
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	PM ✓	10-19-1990

X Room cluttered due to baghouse addition. This will be taken care of after new baghouse start up est. 11-30-90

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025	250KVA	1M-PMM		
	(Out Of Serv. On Site)				
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PMM	<i>RW</i>	2-18-91
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	WF	2/18/91
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	WF	2/18/91
5. Main Sub	Westinghouse 295707	20750 MVA	50 PPM	<i>out of service Dec 1990</i>	
					2/18/91
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	WF	2/18/91
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	WF	2/18/91
8. Baghouse	G.E. H-884638	2,000KVA	1M	WF	2/18/91
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	WF	2/18/91

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

<u>LOCATION</u>	<u>TRANS. MFG./SERIAL #</u>	<u>SIZE</u>	<u>TYPE OIL</u>	<u>INSP. BY</u>	<u>DATE INSPECTED</u>
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PPM	Peter Mahel	5-10-91
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PPM	Peter Mahel	5-10-91
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	Waid Farmer	5/13/91
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	Waid Farmer	5/13/91
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	NAP Peter Mahel	5-10-91
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	Peter Mahel	5-10-91
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	Waid Farmer	5/13/91
8. Baghouse	G.E. H-884638	2,000KVA	1M	Waid Farmer	5/13/91
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	Peter Mahel	5-10-91

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1113025 (Out Of Serv. On Site)	250KVA	IM-PME	P. T. Mahab	
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PMM	Peter Mahab	8-20-91
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	Wail Farmer	8-23-91
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	Wail Farmer	8-23-91
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	NA	
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	Peter Mahab	8-20-91
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	Wail Farmer	8-23-91
8. Baghouse	G.E. H-884638	2,000KVA	1M	Wail Farmer	8-23-91
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	Peter Mahab	8-20-91

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PPM		
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PPM		
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M		
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M		
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	<i>out of service, Dec 1990</i>	
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM		
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM		
8. Baghouse	G.E. H-884638	2,000KVA	1M		
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM		

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSPE. BY	DATE INSPECTED
MILL SUB	GE H-887303	1,000KVA	1M-PMM	Peter Mahel	11-26-91
MELT SHOP	WEST. YBR83872	1,000KVA	1M	Wesl Farmer	11/26/91
MELT SHOP	WEST. YBR83871	1,000KVA	1M	Wesl Farmer	11/26/91
MAIN SUB	WEST. PLR47281	7.5MVA	160-PPM	Peter Mahel	11-26-91
BAGHOUSE	GE H884638	2,000KVA	1M	Wesl Farmer	11/26/91
MAINT SUB	GE 11-885865	500KVA	1M-PPM	Peter Mahel	11-26-91

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSPE. BY	DATE INSPE
MILL SUB	GE H-887303	1,000KVA	1M-PMM	Peter mohr	9-28-
MELT SHOP	WEST. YBR83872	1,000KVA	1M	LI	
MELT SHOP	WEST. YBR83871	1,000KVA	1M	LI	
MAIN SUB	WEST. PLR47281	7.5MVA	160-PPM	LI	
BAGHOUSE	GE H884638	2,000KVA	1M	LI	
MAINT SUB	GE 11-885865	500KVA	1M-PPM	LI	

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSPE. BY	DATE INSPECTED
MILL SUB	GE H-887303	1,000KVA	1M-PMM	Peter Morland	6-15-92
MELT SHOP	WEST. YBR83872	1,000KVA	1M	Ward Farmer	6-30-92
MELT SHOP	WEST. YBR83871	1,000KVA	1M	Ward Farmer	6-30-92
MAIN SUB	WEST. PLR47281	7.5MVA	160-PPM	Ward Farmer	6-30-92
BAGHOUSE	GE H884638	2,000KVA	1M	Ward Farmer	6-30-92
MAINT SUB	GE 11-885865	500KVA	1M-PPM	Peter Morland	6-15-92

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSPE. BY	DATE INSPECTED
MILL SUB	GE H-887303	1,000KVA	1M-PMM	Peter Mahel	3-9-92
MELT SHOP	WEST. YBR83872	1,000KVA	1M	Ward Farmer	3-10-92
MELT SHOP	WEST. YBR83871	1,000KVA	1M	Ward Farmer	3-10-92
MAIN SUB	WEST. PLR47281	7.5MVA	160-PPM	Ward Farmer	3-10-92
BAGHOUSE	GE H884638	2,000KVA	1M	Ward Farmer	3-10-92
MAINT SUB	GE 11-885865	500KVA	1M-PPM	Ward Farmer	3-10-92

APTUS

December 4, 1991

Aptus
Environmental Services

P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

DON DISTEL
MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OH 43302

RE: Aptus Document No. AT15M

Dear DON DISTEL:

Enclosed, please find your Certificate of Disposal from Aptus, which certifies that your waste material received on the manifest referenced has been properly disposed. Also, enclosed is a detail summary of the movement of your material.

Aptus would like to express our appreciation to you and hope that we can assist you in solving your waste management needs in the future.

Should you have any questions regarding our services, please contact your Customer Service Representative from 8:00 AM to 5:00 PM.

24 Hour Spill Response call 1-800-292-2558 or (316)251-6380.

Enclosures

APTUS

December 4, 1991

Aptus

Environmental Services

P.O. Box 1328

Coffeyville, KS 67337

(316) 251-6380

FAX (316) 251-7498

Sales FAX (316) 251-1095

Incinerator FAX (316) 251-0089

CERTIFICATE OF DISPOSAL

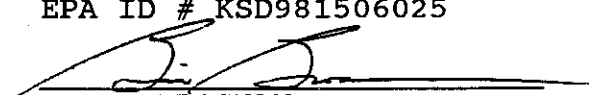
NO. 9425

MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OH 43302

- A. THIS IS TO CERTIFY THAT THE HAZARDOUS SUBSTANCE MANIFESTED TO **APTUS** ON APTUS DOCUMENT #AT15M WAS DISPOSED OF IN ACCORDANCE WITH 40 CFR 761 (AND 40 CFR 264 IF APPLICABLE) AS OF 11/26/91. ATTACHED, IS A DETAIL REPORT WHICH IDENTIFIES THE DATE(S) OF DISPOSAL AND THE PROCESS UTILIZED FOR EACH WASTE LISTED.
- B. UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S. C. 1001 AND 15 U.S. C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE AND COMPLETE. AS TO THE IDENTIFIED SECTIONS(S) (A.) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

APTUS

EPA ID # KSD981506025



BRIAN BROSNAN

MANAGER, ENVIRONMENTAL AFFAIRS

Aptus

DETAIL REPORT

PAGE NO. 1

GENERATOR
MARION STEEL COMPANY
912 CENEY AVENUE

CORRESPONDENT
ENVIRONMENTAL MANAGEMENT CTRL
1141 COUNTY ROAD 51

WORKORDER # 71034
APT DOC # AT1.5M
QST MANIFEST:

MARION OH 43302

GENOA

OH 43430

STATE MANIFEST:

EPA # CHD032271975
PHONE: 6143834011

PHONE: 4198658378

DATE OF REPORT: 12/04/91

DOH DISTEL

JERRY MONROE

SALESMAN: JEFF SMITH

CODE: 0014768

CODE: 0006628

HOLD BACK: 0%

ITEM	PROTYPE	QNT	DESCRIPTION	SERIAL/DRAW #	CONCEN	UNIT WT	QTY	UNIT	LOCATN	DISPOSAL FACILITY	SHIPMAN	COLUMBER	ACCEPTED	OUT/SPIC	SHIP	DESTROY	COSENT
1	CAPS	1	1 of 15/	284	284.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
2	CAPS	1	2 of 15/	274	274.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
3	CAPS	1	3 of 15/	286	286.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
4	CAPS	1	4 of 15/	292	292.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
5	CAPS	1	5 of 15/	258	258.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
6	CAPS	1	6 of 15/	290	290.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
7	CAPS	1	7 of 15/	484	484.00	4027000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
8	CAPS	1	8 of 15/	290	290.00	4027000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
9	CAPS	1	9 of 15/	390	390.00	4027000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
10	CAPS	1	10 of 15/	278	278.00	4027000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
11	CAPS	1	11 of 15/	274	274.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
12	CAPS	1	12 of 15/	288	288.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
13	CAPS	1	13 of 15/	270	270.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
14	CAPS	1	14 of 15/	284	284.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
15	CAPS	1	15 of 15/	292	292.00	4033000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
16	DEBI	1	SPP-HARD HAT-LEATHER	116	116.00	4025000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
17	DEBI	1	SPP-HARD HAT-LEATHER	320	320.00	4025000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
18	CAPS	1	1 of 2/2M	256	256.00	4027000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	
19	CAPS	1	2 of 2/1M	224	224.00	4027000	APLUS	INCINERATOR	COFFEYVILLE,KS	COPT1	9425	04/16/91	01/31/91	10/25/91	11/26/91	12/04/91	

MANIFESTS ON JOB NUMBER 71034
ATTN

APTUS

March 25, 1991

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

STEVE WASHBURN
MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OH 43302

RE: Aptus Document No. 017YM

Dear STEVE WASHBURN:

Enclosed, please find your Certificate of Disposal from Aptus, which certifies that your waste material received on the manifest referenced has been properly disposed. Also, enclosed is a detail summary of the movement of your material.

Aptus would like to express our appreciation to you and hope that we can assist you in solving your waste management needs in the future.

Should you have any questions regarding our services, please contact one of our offices from 8:00 AM to 5:00 PM.

24 Hour Spill Response call 1-800-292-2558 or (316)251-6380.

Sincerely,



SHERI SANDERS
PCB DOCUMENT ADMINISTRATOR

Enclosure

APTUS

March 25, 1991

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

CERTIFICATE OF DISPOSAL

NO. 5741

MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OH 43302

- A. THIS IS TO CERTIFY THAT THE HAZARDOUS SUBSTANCE MANIFESTED TO **APTUS** ON APTUS DOCUMENT #017YM WAS DISPOSED OF IN ACCORDANCE WITH 40 CFR 761 AS OF 03/04/91. ATTACHED, IS A DETAIL REPORT WHICH IDENTIFIES THE DATE(S) OF DISPOSAL AND THE PROCESS UTILIZED FOR EACH WASTE LISTED.
- B. UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S. C. 1001 AND 15 U.S. C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE AND COMPLETE. AS TO THE IDENTIFIED SECTIONS(S) (A.) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

APTUS

EPA ID # KSD980964993


BRIAN BROSNAN
MANAGER, ENVIRONMENTAL AFFAIRS

DETAIL REPORT

PAGE NO. 1

GENERATOR	MARION STEEL COMPANY	CORRESPONDENT	NONPROCESSED # 67223
912 OREBY AVENUE		ENVIRONMENTAL MANAGEMENT CTRL	APT DOC # 017YM
MARION OH 43002		141 DUNN RDW 51	DISC MANIFEST:
EPA # OH000271975		GENOA OH 43000	STATE MANIFEST:
PHONE: 614/3804011		PHONE: 419/6663078	DATE OREGED IN: 10/17/90
STEVE WAGSTERN		FRED SANDER	DATE OF REPORT: 03/25/91
CODE: 0014788		CODE: 0006628	SALESMAN: JEFF SMITH
			HOLD BACK: 06

ITEM	PROTYPE	QTY	DESCRIPTION	SERIAL/GRAM #	CONCEN	UNIT	LOCATN	D F	SHIP	DISPOSAL FACILITY	SHIPMAN	DESTROY CODE	COSENT	COMBBER	QTY
1	QPS	0		1 OF 3/71	07/31/90	450	0.00	QNT	9804000	F. F. 02/18/91	APTUS INCINERATOR OFFEVILLE,MS	03/04/91	03/12/91	03/25/91	5741
2	QPS	0		2 OF 3/72	07/31/90	526	0.00	QNT	9804000	F. F. 02/18/91	APTUS INCINERATOR OFFEVILLE,MS	03/04/91	03/12/91	03/25/91	5741
3	QPS	0		3 OF 3/73	07/31/90	316	0.00	QNT	9804000	F. F. 02/18/91	APTUS INCINERATOR OFFEVILLE,MS	03/04/91	03/12/91	03/25/91	5741

MANIFESTS ON JOB NUMBER 67223
017M

APTUS

April 26, 1991

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7488
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

DON DISTEL
MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OH 43302

RE: MARION STEEL COMPANY, Aptus Document No. AT15M

Dear DON DISTEL:

Enclosed, please find your copy of the hazardous waste manifest indicating that your waste material has been received and accepted by Aptus.

Immediately following the disposal of all your material, you will receive a complete Certificate of Disposal.

Once again, Aptus would like to express our appreciation to you as a valued customer. Should you have any questions, please feel free to contact our Customer Service Representative in Sales from 8:00 AM to 5:00 PM, Monday through Friday.

Sincerely,



Environmental Affairs

Enclosure

TSM # 423274

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OH D 03 2 2 7 1 9 7 5		Manifest Document No. AT 1 5 M		2. Page 1 of 3		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address Marion Steel Company 912 Cheney Avenue Marion, OH 43302						A. State Manifest Doc. No.					
4. Generator's Phone (614) 383-4011						B. State Generator's ID					
5. Transporter 1 Company Name Tri-State Motor Transit CO.						C. State Transporter's ID					
6. US EPA ID Number M 0 0 0 9 5 0 3 8 9 9 8						D. Transporter's Phone 524-3131					
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address Aptus, Inc. P.O. Box 1328/Hwy. 169 North Coffeyville, KS 67337						G. State Facility's ID					
10. US EPA ID Number K S D 9 8 0 9 6 4 9 9 3						H. Facility's Phone 516-6380					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
						No. Type					
a. RO HAZARDOUS SUBSTANCE, SOLID, N.O.S., ORM-E, NA 9188 (POLYCHLORINATED BIPHENYLS)						915 D M		EST 01/9/55		K M	
b. RO HAZARDOUS SUBSTANCE, SOLID, N.O.S., ORM-E, NA 9188 (POLYCHLORINATED BIPHENYLS)						064 D M		EST 003/64		K	
c. 1955 364 319 x 2 1/2											
d.											
Additional Descriptions of Materials Listed Above						K. Handling Codes for Materials Listed Above					
a. drums of capacitors Storage Dates SEE ATTACHMENT											
b. drums of debris Storage Dates SEE ATTACHMENT											
15. Special Handling Instructions and Additional Information See Enclosed Contingency Plan Work Order #71034 EMERGENCY CONTACT: 1-800-292-2558											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.											
Printed/Typed Name DONALD J. DISTEL						Signature Donald J. Distel			Month Day Year 10/10/91		
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name JAMES D SIMON						Signature James D Simon			Month Day Year 10/10/91		
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name						Signature			Month Day Year		
19. Discrepancy Indication Space Discrepancy OK'd by Jerry Monroe 4-24-91											
11a. 15 dms capacitors 4534 lbs., 2061 kgs.											
11b. 2 dms debris 436 lbs., 198 kgs., 2 dms capacitors 480 lbs., 218 kgs. <i>Can</i>											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name Rick Smithson						Signature Rick Smithson			Month Day Year 10/11/91		

CONTINUATION SHEET

GENERATOR NAME	MANIFEST NUMBER	PAGE 2
MARION STEEL COMPANY	AT15M	OF 3

This continuation sheet contains the information required under 40CFR761.207 - THE MANIFEST-GENERAL REQUIREMENTS.

PCB WASTE TYPE	I.D.#	DATE REMOVED FROM SERVICE FOR DISPOSAL	WEIGHT IN Kg
DRUM OF DEBRIS > 500	1M	1-31-91	EST 200 91
DRUM OF DEBRIS > 500	2M	1-31-91	EST 200 91
DRUM OF DEBRIS > 500	3M	1-31-91	EST 91
DRUM OF DEBRIS > 500	4M	1-31-91	EST 91
DRUM OF CAPACITORS/PURE	5M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	6M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	7M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	8M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	9M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	10M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	11M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	12 AM M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	13M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	14M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	15M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	16M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	17M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	18M	1-31-91	EST 131

CERTIFICATION:

I certify the information listed above accurately describes all of the PCB Waste contained on this manifest.

SIGNATURE	<i>Donald J. Smith</i>
TITLE	SR. PROJECT MGR.
DATE	4-4-91

IF MORE SPACE IS NEEDED PLEASE USE ANOTHER CONTINUATION SHEET

CONTINUATION SHEET

[illegible]

JANUARY 11, 1991

SUB STATION CAPS

DYNA-VAC

<u>STYLE #</u>	<u>SERIAL #</u>	<u>STYLE #</u>	<u>SERIAL #</u>
175C102A26B	7010 2025	175C002A54P	7107 0111
175C102A26B	7010 2038	175C002A54B	7107 0112
" "	7010 2197	175C002A54B	7107 1933
" "	7010 2134		
" "	7010 2034		
" "	7010 2039		
" "	7010 2383		
" "	7010 2142		
" "	7010 2076		
" "	7010 2037		
" "	7010 2088		
" "	7010 2118		
" "	7010 2091		
" "	7010 2326		
" "	7010 2344		
" "	7010 2017		
" "	7010 2087		
" "	7010 2268		
" "	7010 2040		
" "	7010 2042		
" "	7010 2041		
" "	7010 2152		
" "	7010 2030		
" "	7010 2184		
" "	7010 2137		
175C102A26C	7209 4539		
175C102A26C	7209 4523		

OTHER BARREL - CLOTHING

TOTAL 5140#s

cc:

Don Distel
Larry Eblin
Scott Conway



To:

MARION STEEL CO
912 CHENEY AVE.
MARION OH 43302

Generator:

MARION STEEL CO
912 CHENEY AVE.
MARION OH 43302

ATTN: Environmental Department

ATTN: Environmental Department

CERTIFICATE OF DESTRUCTION

Document#: 0903527

Date: 1/15/91

Customer Number

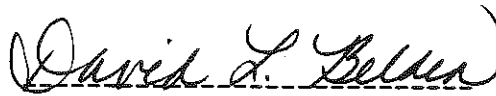
00255700

This document is to certify that S.D. Myers, Inc. has completed Chemical Destruction of your PCBs by utilizing our PCB-GONE Process as outlined in our PCB Destruction Permit and approved by the United States Environmental Protection Agency.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.


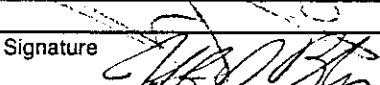
Manifest No.	Date Out of Service	Date of Receipt	Total Gals	Total Kgs	Start PCB PPM	Aroclor	End PCB PPM	Date Finished
90-184-RT	11/22/90	11/23/90	4130.0	13675.4	51	1260	<2	11/28/90

Note: Outgoing PCB-PPM is the maximum result obtained from the oil at the completion of the work.


David L. Belden
Environmental
Coordinator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.						
3. Generator's Name and Mailing Address Marion Steel Co. 912 Cheney Ave./Marion, OH 43302						A. State Manifest Document Number 90-184-RT								
4. Generator's Phone (614) 383-4011						B. State Generator's ID								
5. Transporter 1 Company Name S. D. Myers, Inc.						C. State Transporter's ID								
6. US EPA ID Number 01H01053576294						D. Transporter's Phone 216-633-2666								
7. Transporter 2 Company Name						E. State Transporter's ID								
8. US EPA ID Number						F. Transporter's Phone								
9. Designated Facility Name and Site Address S. D. Myers, Inc. 180 South Ave. Tallmadge, OH 44273						G. State Facility's ID 0HD053576294								
10. US EPA ID Number 01H01053576294						H. Facility's Phone 216-633-2666								
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.		
a. X RQ (1/.45), Hazardous Substance, Liquid, N.O.S., ORM-E, NA9188, (Polychlorinated Biphenyls)						XX12 T		41130		G				
b.														
c.														
d.														
J. Additional Descriptions for Materials Listed Above (off less than 500 ppm)						K. Handling Codes for Wastes Listed Above								
15. Special Handling Instructions and Additional Information														
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.														
Printed/Typed Name Jeff S. Blair					Signature 					Month Day Year 11/12/90				
17. Transporter 1 Acknowledgement of Receipt of Materials														
Printed/Typed Name JEFF S. BLAIR					Signature 					Month Day Year 11/12/90				
18. Transporter 2 Acknowledgement of Receipt of Materials														
Printed/Typed Name					Signature					Month Day Year				
19. Discrepancy Indication Space														
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.														
Printed/Typed Name					Signature					Month Day Year				

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

Style F15 REV-6 LABELMASTER, Div. of AMERICAN LABELMARK CO., CHICAGO, IL 60648 (800) 621-5808

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

EMC

ENVIRONMENTAL MANAGEMENT CONTROL INC.

CC. Scott Conway 11-14-89

419-855-8378

141 COUNTY RD. #51

GENOA, OHIO 43430

November 10, 1989

Marion Steel Company
912 Cheeney Avenue
Marion, Ohio 43302

ATTN: Mr. Larry Eblin

RE: Aptus Document No. 0570M
EMC Proposal No. 89131
Marion Steel P.O. No. 030886-00

Dear Larry:


Enclosed please find your original of the Certificate of Disposal from Aptus, formerly National Electric Inc., which certifies that your waste material received on the manifest referenced has been properly disposed. Also, enclosed is a detail summary of the movement of your material and a copy of the manifest.

Once again, Environmental Management Control, Inc. would like to express our appreciation to you as a valued customer.

Should you have any questions, please feel free to contact the undersigned at (419) 855-8378.

Very truly yours,

ENVIRONMENTAL MANAGEMENT CONTROL, INC.


Fred T. Sander, P.E.
Vice-President Operations

bml

Enclosure

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
(800) 292-2558
FAX (316) 251-7498
Sales FAX (316) 251-1095
Confidential FAX (316) 251-0091
Incinerator FAX (316) 251-0089

October 25, 1989

APTUS

CERTIFICATE OF DISPOSAL


NO. 8351

Marion Steel Company
912 Cheney Avenue
Marion, OH 43430

THIS IS TO CERTIFY THAT THE HAZARDOUS SUBSTANCE
MANIFESTED TO **APTUS** ON APTUS DOCUMENT # 0570M WAS
DISPOSED OF IN ACCORDANCE WITH 40 CFR 761
AS OF 10/16/89.

APTUS

EPA ID # KSD980964993



SHERI SANDERS
PCB DOCUMENT ADMINISTRATOR

Aptus

DETAIL REPORT

PAGE NO. 1

GENERATOR	OPERATOR	JOB # 00525
Marion Steel Company	Environmental Management Control	APT DOC # 0570M
912 Carey Avenue	1141 County Road 51	DATE OF REPORT: 10/25/89
Varion OH 43430	OH 43430	DATE ORDERED IN: 08/10/89
SP1 #	SP1 #	DISPOSAL OPTIONS: OIL/PUR DEC TRM/ESA
P-O-E: 419-855-8375	P-O-E: 419-855-8378	SUESMAN, JON
Mr Fred Sancer	Mr Fred Sancer	
CODE: 45425	CODE: 45426	WLD BACK

ITEM DATE	JOB	TYPE	QTY	DESCRIPTION	Q.S. MFG#	SERIAL	CONCENTRANTS	SUBSTRATE	WEIGHT	HEIGHT	QUANTITY	UNIT	LOCATION	D	F	A	SENT	DISPOSAL FACILITY	WASSENT	DESTROY	CD	REC	CD	SENT	CD	REC	#	
1 08/10/89	00525	TRANS	2740	90		1210025	ASK	PM	07/01/89	4140	55	30	Q-1	C	F	F	T	08/21/89	U.S. ECOLOXY, BEAUTY, W	0370	08/23/89	01/28/89	10/25/89	0	08/09/89	09	54	08025025
2 08/10/89	00525	ASK	FROM	1210025			ASK	PM	07/01/89	1570	165	00	Q-1	0-1	T	T	T	09/12/89	APLUS INCINERATOR	0240	10/16/89	10/18/89	10/25/89		08/09/89	09	55	21046836
3 08/10/89	00525	DEC	90	01 RUBBER SOLES					08/01/89	1200	2	00	D-5	0-CL	0-1	T	T	10/02/89	CHEMICAL WASTE, EXELLE, AL	0000	10/03/89	10/05/89	10/25/89	A-2	08/17/89	11	30	07041871

MANIFESTS ON JOB NUMBER 00525
0570M

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <i>Marion Steel Co 912 Cheney Marion, OH. 43430</i>						A. State Manifest Document Number			
4. Generator's Phone (<i>419</i>) <i>855 8775</i>						B. State Generator's ID			
5. Transporter 1 Company Name <i>Aptus</i>				6. USEPA ID Number <i>M N D 9 8 0 7 9 1 3 2 1</i>		C. State Transporter's ID			
7. Transporter 2 Company Name				8. USEPA ID Number		D. Transporter's Phone <i>612-469-3475</i>			
9. Designated Facility Name and Site Address <i>Aptus P.O. Box 1328/Hwy. 169 North Coffeyville, KS 67337</i>				10. USEPA ID Number <i>K S D 9 8 0 9 6 4 9 9 3</i>		E. State Transporter's ID			
						F. Transporter's Phone			
						G. State Facility's ID			
						H. Facility's Phone <i>316-251-6380</i>			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity	
						No. Type		Unit Wt/Vol	
a. <i>RQ</i> WASTE HAZARDOUS SUBSTANCE, LIQUID OR SOLID, N.O.S., (POLYCHLORINATED BIPHENYLS) ORM-E NA 9188						<i>101 CM</i>		<i>5650 P</i>	
b. <i>RQ</i> WASTE HAZARDOUS SUBSTANCE, LIQUID OR SOLID, N.O.S., (POLYCHLORINATED BIPHENYLS) ORM-E NA 9188						<i>102 DM</i>		<i>400 P</i>	
c. <i>RQ</i> WASTE HAZARDOUS SUBSTANCE, LIQUID OR SOLID, N.O.S., (POLYCHLORINATED BIPHENYLS) ORM-E NA 9188									
d.									
J. Additional Descriptions for Materials Listed Above <i>A. Transformer filled with askeral = 5,590 lbs.</i> <i>6 Drums of debris = 1,208 lbs.</i>						K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information <i>See Enclosed Contingency Plan Work Order # 35925 Discrepancy OK'd w/Fred Sander per phone 8/16/89.</i>									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name <i>Jerry Jezianski</i>						Signature <i>Jerry Jezianski</i>		Month Day Year <i>08/01/89</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name <i>Jerry L Fogle</i>						Signature <i>Jerry L Fogle</i>		Month Day Year <i>08/01/89</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name						Signature		Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name <i>TERRY GREEN</i>						Signature <i>Terry Green</i>		Month Day Year <i>08/10/89</i>	

TRANSFORMER OIL SUMMARY

CUSTOMER				DATE	08/17/88	1	LJNTACT											
MARION STEEL COMPANY				JOB NO.														
912 CHESTER AVE.						(614) 393-4011												
MARION OH 43302						RUE ORDER												
EQUIP. NO.	SERIAL NO.	KVA	LOCATION	COLOR	SLUDGE VISUAL	NEUT. NO.	DIEL KV	IFT	CERT. No.	PCB PPM	GALS	DEMO	RECLAIM	MARGIN	NO. OF OIL SAMPLES	TEST	REMARKS	
00001	1-2912	20000	A FURNACE	1.5	CLR	.040	42	28.9	77359	17	3474					X		
00002	35466-1	18750	B FURNACE	3.0	CLR	.065	50	24.2	78991	35	3850			X				
00003	1213027	833	ROLLING MILL	1.5	CLR	.025	35	39.1	77360	2	634							
00004	1213028	833	ROLLING MILL	1.5	CLR	.010	38	35.1	77361	2	634							
00005	1213026	833	ROLLING MILL	1.5	CLR	.020	33	38.7	77362	2	634							
00006	5574548	200	ROLLING MILL			.000	0		77363	2	148							
00007	H-887303	1150	ROLLING MILL ASKARE			.000	0				156							
00008	1062054	5000	ROLLING MILL NOT LONGER HERE			.000	0		77364	19	3105							
00009	293707	20000	MAIN SUB	2.0	CLR	.075	50	23.3	42759	53	5000			X				
00010	PLR-4728	7500	MAIN SUB	3.0	TRC	.020	40	34.5	42760	160	3440					X		
00011	C-583320	10,000	MAIN SUB	0.5	CLR	.010	31	37.9								X		
00012	C-583321	10,000	MAIN SUB	0.5	CLR	.020	45	37.6								X		



1700 GATEWAY BLVD., S.E., CANTON, OHIO 44707
Phone 216-452-0837

ATTACHMENT D



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

FIELD CITATION

MARION STEEL COMPANY
Facility Name
912 CHENEY AVE.
MARION Ohio 43302
Facility Address City, State
* * *

Compliance Inspection
Date:
November 30, 1992 and
December 1, 1992

This is a formal notification concerning the compliance inspection conducted at the facility named above, pursuant to Section II of the Toxic Substances Control Act (TSCA), 15 U.S.C. Section 2601 et seq. The purpose of the inspection was to assess the facility's compliance with the requirements of the Polychlorinated Biphenyls (PCB) Final Rule, 40 C.F.R. Part 761, and amendments.

Issuance of this citation and receipt of any documentation does not preclude the U.S. EPA from proceeding under TSCA or any other applicable statute and assessing appropriate penalties. Any enforcement action taken by the U.S. EPA after a final evaluation of the inspection report would not be limited to the violations listed in this citation.

It appears that the above-named facility was not in compliance with the requirements of 40 C.F.R. Part 761. The inspection revealed the following violations:

1. ☐ AUTHORIZATIONS
(Use 761.30)

2. ☐ MARKING
(761.40)

3. ☒ STORAGE
(761.65)

☒ RECORDKEEPING
(761.180)

5. OTHER Notification 761.205
Manifesting 761.207-208
Spill Cleanup Policy 761.125(c)(5)

Comments On Violations Cited Above

761.180(a): Records - MISSING AND/OR INCOMPLETE ANNUAL PCB DOCUMENT LOGS FOR 1989, 1990 AND 1991. ALSO; 1983 through 1988.

(i)

- TIME PERIOD FOR 1989 ANNUAL DOCUMENT 1/1/89 to 2/5/90
- TIME PERIOD FOR 1990 AND 1991 IS CALENDAR YEAR (JAN. 1 TO DEC. 31)
- 1989 ANNUAL DOCUMENT WAS MISSING AND ANNUAL DOCUMENT FOR 1990 AND 1991 DID NOT INDICATE APPROPRIATE TIME PERIOD, ALSO, ADDRESS AND EPA IDENTIFICATION NUMBER NOT INDICATED ON ANNUAL DOCUMENT FOR 1990 AND 1991.

(ii)

- UNIQUE MANIFEST NUMBER NOT LISTED ON ANNUAL DOCUMENT FOR 1989, 1990, 1991

(c) - UNIQUE IDENTIFICATION NUMBER AND WEIGHT OF PCB ~~IN~~ CONTAINERS AS WELL AS PCB CONTAINERS THEMSELVES MISSING FROM RECORDS. (CLEANUP DEBRIS FROM PCB CAPACITOR SPILL).

(D)(iii) Total weights of PCB Articles and PCBs in kilograms remaining in service at the end of the calendar year.

(D)(iv) Total weight in kilograms of PCB transformers remaining in service at the end of the calendar year

(D)(v): Total number of high or low voltage large PCB capacitors remaining in service at the end of the calendar year.

761.205: Notification of PCB Activity: Failure to Notify US EPA via form 720-53 of facility's PCB storage of PCB capacitors which, according to Manifest #ATISM dated 4/4/91 and continuation sheet, capacitors were stored more than 30 days. Have 761.65(b)(2) *drag 4/4/91*

~~761.207~~: 761.211: Unmanifested PCB shipment: Proper generator I.D. number not used for shipment of PCB capacitors dated 4/4/91 Manifest #ATISM *No/Am use PCRA #.*

761.125(c)(5): Spill Cleanup Documentation: Facility failed to provide cleanup documentation of PCB Capacitor fluid spill in Main substation. Facility failed to provide cleanup document in format specified under this section.

CITATION

DOCUMENTATION REQUIRED TO CORRECT THE ABOVE VIOLATION(S)

761.180(a) Reconstruct Annual PCB Document Logs for 1983 through 1991 according to format specified under this section.

761.125 (EXs) Spill Cleanup Documentation. Reconstruct cleanup document according to format stated in this section of the PCB regulations.

* Copy of Regulations provided at time of inspection

Within thirty (30) days of receipt of this Field Citation this facility must submit the requested documentation to show that the violation(s) has/have been corrected. The documentation must be submitted to:

Inspector's Name Charlotte E. Hammar
Ohio EPA / OERR / CEDU

Address P.O. Box 1049

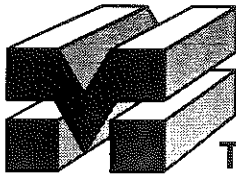
City, State Columbus, Ohio 43266-0149

If you have questions concerning this inspection or this Field Citation, please call the inspector at (614) 644-3067

Mr. Scott Conway
Refused to sign 3rd Page of Field Citation.

Issued To/Received By _____ Date _____

Charlotte E. Hammar 12/1/92
Inspector's Signature Date



THE MARION STEEL COMPANY

912 CHENEY AVENUE

MARION, OHIO 43302

614-383-4011

FAX 614-383-8429
EMERGENCY PREPAREDNESS
& PREVENTION SECTION

92 DEC 29 AM 8:51

December 28, 1992

RECEIVED

Ms. Charlotte E. Hammar
PCB Inspector
Ohio Environmental Protection Agency
1800 WaterMark Drive
P. O. Box 1049
Columbus, Ohio 43266-0149

Dear Ms. Hammar:

This letter is written in response to the Field Citation issued to Marion Steel Company on December 11, 1992.

Although we do not agree that our facility was in violation of all of the regulations cited in the Field Citation, we acknowledge that the manner in which required information was organized made your determination of our compliance status more difficult. To correct this situation, we have prepared an outline which matches the structure of 40 C.F.R. Part 761, and have inserted the appropriate information (supplemented as appropriate) under each subpart of the regulation.

After you have reviewed the enclosed, I would appreciate it if you would advise me whether the information provided, and the format, is complete and acceptable to you.

With regard to the asserted violation of 40 C.F.R. §761.211 ("unmanifested PCB shipment: proper generator I.D. number not used for shipment of PCB capacitors dated 4/4/91, manifest #AT15M"), we must ask you to clarify. I have reviewed that manifest, and Marion Steel's given generator number is included in the appropriate place on the form.

No violation

Finally, I wish to express my regret over the manner in which you and I interacted at the time of your visit to the plant. Although I can appreciate the regulatory agencies' interests in making unexpected inspections, an unannounced visit at 4:00 p.m. to inspect our records seems to violate the spirit of TSCA's requirement (15 U.S.C. §2610) that inspections be conducted at reasonable times and in a reasonable manner.

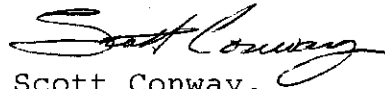
But I do not wish to rely upon the niceties of the law. You are always welcome at our facility, but I would appreciate it if you would give me a day, or even a few hours, notice in order that I can rearrange my calendar to accommodate you. There is

Charlotte E. Hammar
Page Two

December 28, 1992

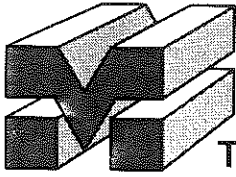
nothing we could do in that amount of time to conceal things from you, or manufacture records, even if we wished to. Which we don't.

Sincerely,


Scott Conway,
Plant Manager

/cb

Enclosures



THE MARION STEEL COMPANY

912 CHENEY AVENUE

MARION, OHIO 43302

614-383-4011
FAX: 614-383-6429

December 17, 1992

Ms. Charlotte E. Hammar
PCB Inspector
Ohio Environmental Protection Agency
1800 WaterMark Drive
P.O. Box 1049
Columbus, OH 43266-0149

Dear Ms. Hammar,

Please find the required documentation required to correct the alleged violation listed in Marion Steel Field Citation dated November 30, 1992 and December 1, 1992.

Please advise if any of this information is incomplete.

In addition, we are asking for reclarification of your comments on the violation cited for CFR761-211 since the proper generator I.D. number seems to be in place on the shipping manifest number AT15M.

Sincerely,

Scott Conway
Plant Manager

/cb

cc: S. Samuels

Enclosures

MARION STEEL COMPANY
912 CHENEY AVENUE
MARION OHIO 43302

December 15, 1992
EPA ID NO. OH D032271975

PCB SPILL CLEAN UP DOCUMENTATION

CFR 761.125(c)(5) RECORDS

5(i) IDENTIFICATION OF SOURCE OF SPILL:

3-Ruptured Westinghouse 200 var PCB capacitors containing inerteen. This spill was discovered by EPA inspectors on 7/7/89.

5(ii) Estimated date of spill:

8/3/83

5(iii) Completed date of clean up :

8/1/89

5(iv),(v) Description of spill:

The spill was located in the main electrical substation below the south bank of capacitors. The gravel and soil directly beneath the bank were saturated in approximately a 2 foot diameter circle. The spill was plainly visible and apparently localized to this circle.

* See attached pre-clean up sampling data

5(vi) N/A

5(vii) Depth and quantity of soil removed:

There were 2 seperate clean up efforts initiated for this discovered spill. The first clean up resulted in approximately 1-55 gallon drum of soil and gravel being removed from the area. Post clean up sampling still indicated the presence of PCBs. Additional clean up was recommended by the EPA inspectors, subsequently, a second 55-gallon drum of soil was removed from the area.

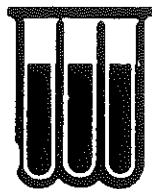
Total Depth -	approximately 2 - 3 feet
Total Quantity -	2-55 gallon drums
Total Weight-	1,208 lbs.

5(viii) Post clean up verification data:

** See attached post clean up data

5(ix) Estimated cost of clean up:

Man hours	- 10 @ \$15/hr	= \$ 150
Disposal	- actual amt.	= \$ 2,100
Total		= \$ 2,250



WADSWORTH/ALERT
LABORATORIES, INC.

PRE-CLEAN UP (5 PAGES) 1

COMPANY : OHIO EPA-DIV OF EMERGENCY RESPONSE
LAB #: 6810-23802
MATRIX: SOLID

DATE RECEIVED: 7/10/89
DATE EXTRACTED: 7/10/89
DATE ANALYZED: 7/13/89

SAMPLE ID: MAIN SUBSTATION OIL STAINED AREA UNDER CAPACITOR BANK

POLYCHLORINATED BIPHENYLS
METHOD 8080 LIST - GC

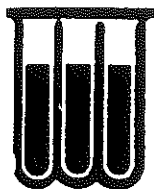
PCB-1016	86,000
PCB-1221	ND
PCB-1232	ND
PCB-1242	ND
PCB-1248	ND
PCB-1254	ND
PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 39,000 mg/kg) as rec'd
ND* (None Detected, lower detectable limit = mg/kg) as rec'd
-- (Not Analyzed)



WADSWORTH/ALERT
LABORATORIES, INC.

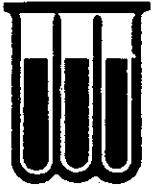
QUALITY CONTROL SECTION



WADSWORTH/ALERT
LABORATORIES, INC.

MATRIX SPIKE DATA

LAB ID	PARAMETER	SPIKE PERCENT RECOVERY	SPK/DUP PERCENT RECOVERY	SPIKE MATRIX	QC CONTROL LIMITS
890710	Polychlorinated Biphenyls	94	95	SOLID	(46-122



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories
LAB #: 9289-92710
MATRIX: SOLID

DATE RECEIVED: 7/10/89
DATE EXTRACTED: 7/10/89
DATE ANALYZED: 7/12/89

SAMPLE ID: INTRA-LAB BLANK , 7 /10/89

POLYCHLORINATED BIPHENYLS
ANALYTICAL BLANK REPORT

PCB-1016	ND
PCB-1221	ND
PCB-1232	ND
PCB-1242	ND
PCB-1248	ND
PCB-1254	ND
PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 1 mg/kg) as rec'd
ND* (None Detected, lower detectable limit = mg/kg) as rec'd
-- (Not Analyzed)



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories
LAB #: 9289-92711
MATRIX: SOLID

DATE RECEIVED: 7/11/89
DATE EXTRACTED: 7/11/89
DATE ANALYZED: 7/13/89

SAMPLE ID: INTRA-LAB BLANK , 7 /11/89

POLYCHLORINATED BIPHENYLS
ANALYTICAL BLANK REPORT

PCB-1016	ND
PCB-1221	ND
PCB-1232	ND
PCB-1242	ND
PCB-1248	ND
PCB-1254	ND
PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 1
ND* (None Detected, lower detectable limit =
-- (Not Analyzed)

mg/kg) as rec'd
mg/kg) as rec'd

POST CLEAN UP No. 1

AQUA TECH ENVIRONMENTAL CONSULTANTS, INC.

P.O. Box 76
Melmore, Ohio 44845
(419) 397-2659

Client: MARION STEEL COMPANY	
Address: 912 CHENEY AVENUE MARION, OH 43302 ATTN: SCOTT CONWAY	
Project No:	Date(s) of Receipt at Laboratory:
Purchase Order:	JULY 27, 1989
Comments:	

Sample Inventory		
Atec No.	Client No.	Method(s)
7671	MS-1 CENTER	8080
7672	MS-2 EAST	8080

Comments: SENT RESULTS TO FAX # 614-383-6429 ON 8/11/89

Authorized Signature: *Robert S. Edwards*

Title: Melmore Laboratory Manager

Date Released: AUGUST 11, 1989

Marion Steel Co.
Polychlorinated Biphenyl (PCB) Analysis
Method Number 8080
Date Received: July 27, 1989

Atec Lab No.	7671	7672
Client Sample No.	MS-1 Center	MS-2 East
Analyst	CMR	CMR
Date Analyzed	8/11/89	8/11/89
Aroclor 1016	< 10.0	< 10.0
Aroclor 1221	< 10.0	< 10.0
Aroclor 1232	< 10.0	< 10.0
Aroclor 1242	1360	4500
Aroclor 1248	< 10.0	< 10.0
Aroclor 1254	< 10.0	< 10.0
Aroclor 1260	< 10.0	< 10.0

All results are reported as mg/kg dry weight.



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : OHIO EPA-DIV OF EMERGENCY RESPONSE
LAB #: 1535-30024
MATRIX: SOLID

DATE RECEIVED: 9/ 5/89
DATE EXTRACTED: 9/ 6/89
DATE ANALYZED: 9/13/89

SAMPLE ID: 01 MAIN SUBSTATION: AREA BELOW S. CAPACITOR BANK 8-31-89 1120

POLYCHLORINATED BIPHENYLS
METHOD 8080 LIST - GC

PCB-1016	210
PCB-1221	ND
PCB-1232	ND
PCB-1242	ND
PCB-1248	ND
PCB-1254	ND
PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 70
ND* (None Detected, lower detectable limit =
-- (Not Analysed)

ng/kg) as rec'd
ng/kg) as rec'd

ANNUAL REPORT

OF

POLYCHLORINATED BIPHENYLS (PCB'S)

THE MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OHIO 43302
(614) 383-4011

FOR REPORTING PERIOD

JANUARY 1, 1991 - DECEMBER 31, 1991

REPORT REVISED DECEMBER 1, 1992

PREPARED BY: SCOTT CONWAY

GENERATOR U.S. EPA ID #

OH D032271975

TABLE OF CONTENTS

I	PCB Contaminated Electrical Equipment at Year Beginning
II	Summary of PCB Activity
III	Quarterly Inspection Report
IV	Supporting Documentation 1) Shipping Manifests 2) Certificates of Disposal 3) Correspondence
V	PCB Annual Document

I

PCB Contaminated
Electrical Equipment
at
Year Beginning

1. Equip. Description: 500 KVA Transformer, 13,800 - 480V
Location: Maintenance Building Sub Station
Serial Number: H-885865
Manufacturer: General Electric
Date Purchased/
Placed in Service: 1977
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Pyranol
B. Volume (Gal) 112
C. Weight (kg) 631

2. Equip. Description: 2000 KVA Transformer, 13,800 - 480V
Location: Bag House Sub Station
Serial Number: H-884638
Manufacturer: General Electric
Date Purchased/
Placed in Service: 1976
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Pyranol
B. Volume (Gal) 243
C. Weight (kg) 1384

3. Equip. Description: 1000 KVA Transformer, 13,800 - 480V
Location: #1 Unit (West) Melt Shop Sub Station
Serial Number: YBR-83871
Manufacturer: Westinghouse
Date Purchased/
Placed in Service: 1967
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name:	Inerteen
B. Volume (Gal)	195
C. Weight (kg)	987

4. Equip. Description: 1000 KVA Transformer, 13,800 - 480V
Location: #2 Unit (East) Melt Shop Sub Station
Serial Number: YBR-83872
Manufacturer: Westinghouse
Date Purchased/
Placed in Service: 1967
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name:	Inerteen
B. Volume (Gal)	195
C. Weight (kg)	984

5. Equip. Description: 1000 KVA Transformer, 13,800 - 480V
Location: Mill Building 480V Sub Station
Serial Number: H-887303
Manufacturer: General Electric
Date Purchased/
Placed in Service: 1975
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Pyranol
B. Volume (Gal) 156
C. Weight (kg) 883

7. Equip. Description: 7.5 MVA Transformer, 138,000/13,800
Location: Main Sub Station (West Side)
Serial Number: FLR 47281
Manufacturer: Westinghouse
Date Purchased/
Placed in Service: 1967
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Oil (Contaminated)*
B. Volume (Gal) 4,130
C. Weight (kg) 13,675.4

*Note: Oil is PCB contaminated at 160 ppm, retrofilled
on 11/22/90, awaiting oil analysis to
declassify.

should be

6. Equip. Description: 20/26.6/33 MVA Transformer, 138,000/
13,800

Location: Main Sub Station (East Side)

Serial Number: 293707

Manufacturer: Westinghouse

Date Purchased/
Placed in Service: 1967

Date Removed
from Service: 12/15/90

Description of PCB Fluid:

A. Brand Name: Oil (Contaminated)*

B. Volume (Gal) 5,580

C. Weight (kg) 16,556.1

*Note: Prior to 11/23/90, this oil was at a contamination level of 77 ppm. After S.D. Meyer retrofill, contamination level was less than 2 ppm. Transformer was taken out of service on 12/15/90. On 3/91 the oil was removed by S.D. Meyer from transformer and properly disposed of. The transformer was sold to Magnetek on 9/25/91.

*Should be analyzed
under PCBs in
contaminated.*

8. Equip. Description: 2.5 KVAR Capacitor Assembly
Location: Main Sub Station (West Side)
Serial Number: 72111547
Manufacturer: Westinghouse
Date Purchased/
Placed in Service: 1976
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name:	Inerteen
B. Volume (Gal)	.94
C. Weight (kg)	4.7

9. Equip. Description: 3 Furnace Switch Gear Capacitors
100 VAR, 14,400V

Location: "B" Furnace (Upper)

Serial Number: 7107-0111, 7107-0112, 7107-1933

Manufacturer: Westinghouse

Date Purchased/
Placed in Service: 1980

Date Removed
from Service: 1/31/91

Description of PCB Fluid:

A. Brand Name: Inerteen

B. Volume (Gal) 2.65

C. Weight (kg) 13

10. Equip. Description: 3 Furnace Switch Gear Capacitors
100 VAR, 13,800V

Location: "B" Furnace (Lower)

Serial Number: L02-4146, L02-4124, C-54862

Manufacturer: General Electric

Date Purchased/
Placed in Service: 1976

Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Pyranol

B. Volume (Gal) .5

C. Weight (kg) 2.5

12. Equip. Description:

36 Mill Capacitors
15 KVAR, 2,400V

Location:

Rolling Mill Sub Station

Serial Number:

(South Cabinet) 50B525, 50B507,
50B506, 50B515, 50B516, 50B532,
50B531, 50B533, 50B534, 50B513,
50B514, 50B523

(Middle Cabinet) 50B528, 50B510,
50B512, 50B424, 50B522, 50B529,
50B517, 50B508, 50B504, 50B509,
50B521, 50B526

(North Cabinet) 51J108, 50E733,
50E763, 50E749, Remaining 8 are 50
Series, Serial #'s unknown.

Manufacturer:

Westinghouse

Date Purchased/

Placed in Service:

1955

Date Removed
from Service:

N/A

Description of PCB Fluid:

A. Brand Name: Inerteen

B. Volume (Gal) 1.72

C. Weight (kg) 8.3

11. Equip. Description: 3 Furnace Switch Gear Capacitors
100 VAR, 14,400V

Location: "A" Furnace (Upper)

Serial Number: No Nameplate on 2 Capacitors
7107-0113

Manufacturer: Westinghouse

Date Purchased/
Placed in Service: 1980

Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Inerteen

B. Volume (Gal) 2.73

C. Weight (kg) 13.5

14. Equip. Description: 2 Main Sub Capacitors
200 VAR, 8,320V

Location: Main Sub Station (South Bank)

Serial Number: (Top Bank) 7601-0421, 7609-3018

Manufacturer: Westinghouse

Date Purchased/
Placed in Service: 1976

Date Removed
from Service: 1/31/91

Description of PCB Fluid:

A. Brand Name: Inerteen

B. Volume (Gal) 3.72

C. Weight (kg) 18.5

13. Equip. Description: 27 Main Sub Capacitors
200 VAR, 7,960V

Location: Main Sub Station (North Bank)

Serial Number: (Top Bank) 7010-4539, 7010-2039,
7010-2034, 7010-2025, 7010-2383,
7010-2076, 7010-2088, 7010-2037

(Middle Bank) 7010-2142, 7010-2134,
7010-2017, 7010-2087, 7010-2268,
7010-2344, 7010-2326, 7010-2091,
7010-2118

(Bottom Bank) 7010-2038, 7209-4523,
7010-2197, 7010-2040, 7010-2042,
7010-2041, 7010-2152, 7010-2030,
7010-2184, 7010-2137

Manufacturer: Westinghouse

Date Purchased/
Placed in Service: 1967

Date Removed
from Service: 1/31/91

Description of PCB Fluid:

A. Brand Name: Inerteen

B. Volume (Gal) 3.1

C. Weight (kg) 15.7

II

Summary of PCB Activity

ACTIVITY REPORT

ANNUAL SUMMARY OF POLYCHLORINATED BIPHENYLS (PCBS) JANUARY 1, 1991-DECEMBER 31, 1991

MARION STEEL COMPANY, 912 CHENEY AVENUE, MARION OH., 43302
GENERATOR U.S. EPA ID NO. OH D032271975

NO.	EQUIPMENT DESCRIPTION	SERIAL NO.	LOCATION	PCB STATUS	VOL. (GAL.)	WT. (KGS)	DATE IN SERV.	ACTIVITY	DATE REMOVED	DATE DISPOSED	VENDOR	WHSST. NO.	CRT. DSPL. NO.
1.	WEST. 20 MVA TRANSFR.	293707	MAIN SUB	9	5000	57,000 LBS	1967	FAILED	12/15/90 OIL	9/25/91 2/22/91	MAGNATEK S.D. MEYER	N/A 00192	N/A 0913094
2.	WEST. 200 KVAC CAPCTRS.	(7209-4532, 7010-2033, 7010-2034, 7010-2025, 7010-2038, 7010-2179, 7010-2134, 7010-2083, 7010-2142, 7010-2076, 7010-2037, 7010-2088, 7010-2118, 7010-2091, 7010-2326, 7010-2344, 7010-2017, 7010-2087, 7010-2268, 7010-2049, 7010-2042, 7010-2041, 7010-2152, 7010-2030, 7010-2184, 7010-2137, 7209-4523, 7601-0421, 7609-3018) *											
29 TOTAL			MAIN SUB	INSETEEN	N/A	2061	1967	REMOVED	1/31/91	4/4/91	APTUS	AT15H	9425
3.	DEBRIS, CLOTHING, ETC.	N/A	MAIN SUB	PCB > 500PPM	N/A	198	N/A	CLEANUP	1/31/91	4/4/91	APTUS	AT15H	9425
4.	WEST. 100 KVAC CAPCTRS.	7107-0111 7107-0112 7107-1933	B ENCR. UP	INSETEEN	N/A	EST. 100 LBS	9/80	REMOVED	1/31/91	4/4/91	APTUS	AT15H	9425

* SERIAL NUMBERS OF ALL 29 CAPACITORS, WHICH ARE OF SAME TYPE

III

Quarterly Inspection Report

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025	250KVA	1M-PMM		
	(Out Of Serv. On Site)				
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PMM	<i>(RW)</i>	2-18-91
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	WF	2/18/91
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	WF	2/18/91
5. Main Sub	Westinghouse 295787	20750 MVA	58 PPM	<i>out of service Dec 1990</i>	
					2/18/91
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	WF	2/18/91
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	WF	2/18/91
8. Baghouse	G.E. H-884638	2,000KVA	1M	WF	2/18/91
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	WF	2/18/91

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PMM	Peter Mahel	5-10-91
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PMM	Peter Mahel	5-10-91
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	Wail Farmer	5/13/91
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	Wail Farmer	5/13/91
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	NA Peter Mahel	5-10-91
Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	Peter Mahel	5-10-91
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	Wail Farmer	5/13/91
8. Baghouse	G.E. H-884638	2,000KVA	1M	Wail Farmer	5/13/91
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	Peter Mahel	5-10-91

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1113025 (Out Of Serv. On Site)	250KVA	1M-PM	Peter Walsh	
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PPM	Peter Walsh	8-20-91
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	Wail Farmer	8-23-91
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	Wail Farmer	8-23-91
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	NA	
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	Peter Walsh	8-20-91
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	Wail Farmer	8-23-91
8. Baghouse	G.E. H-884638	2,000KVA	1M	Wail Farmer	8-23-91
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	Peter Walsh	8-20-91

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSPE. BY	DATE INSPECTED
MILL SUB	GE H-887303	1,000KVA	1M-PMM	Peter Mahed	11-26-91
MELT SHOP	WEST. YBR83872	1,000KVA	1M	Weil Farmer	11/26/91
MELT SHOP	WEST. YBR83871	1,000KVA	1M	Weil Farmer	11/26/91
MAIN SUB	WEST. PLR47281	7.5MVA	160-PPM	Peter Mahed	11-26-91
BAGHOUSE	GE H884638	2,000KVA	1M	Weil Farmer	11/26/91
MAINT SUB	GE 11-885865	500KVA	1M-PPM	Peter Mahed	11-26-91

IV

Supporting Documentation

- 1) Shipping Manifests
- 2) Certificates of Disposal
- 3) Correspondence

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 0 H D 0 3 2 2 7 1 9 7 5 0 0 1 9 2		Manifest Document No. 0 0 1 9 2		2. Page 1 of		Information in the shaded areas is not required by Federal law.											
3. Generator's Name and Mailing Address MARION STEEL CO. 912 CHENEY AVE./MARION, OH 43302						A. State Manifest Document Number 00192													
4. Generator's Phone (614) 383-4011						B. State Generator's ID													
5. Transporter 1 Company Name S.D. MYERS, INC.						C. State Transporter's ID													
6. US EPA ID Number 0 H D 0 5 3 5 7 6 2 9 4						D. Transporter's Phone 216-633-2666													
7. Transporter 2 Company Name						E. State Transporter's ID													
8. US EPA ID Number						F. Transporter's Phone													
9. Designated Facility Name and Site Address S. D. MYERS, INC. 180 SOUTH AVE. TALLMADGE, OH 44278						G. State Facility's ID													
10. US EPA ID Number 0 H D 0 5 3 5 7 6 2 9 4						H. Facility's Phone 215 216-633-2666													
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.							
a. X RQ Hazardous Substance, Liquid, N.O.S., ORM-E, NA9188 (PCB's) (011, In Tanker, under 500 PPM PCB)						001 T T 16492 X													
b.																			
c.																			
d.																			
J. Additional Descriptions for Materials Listed Above PCB 2 SEE ATTACHED MANIFEST CONTINUATION SHEET FOR ADDITIONAL INFORMATION						K. Handling Codes for Wastes Listed Above													
15. Special Handling Instructions and Additional Information 24 HOUR EMERGENCY RESPONSE NUMBER 216-945-2554																			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																			
Printed/Typed Name John J. Koss					Signature <i>John J. Koss</i>					Month Day Year 10/23/19/11									
17. Transporter 1 Acknowledgement of Receipt of Materials					Printed/Typed Name Thomas J. Crocker					Signature <i>Thomas J. Crocker</i>					Month Day Year 10/23/19/11				
18. Transporter 2 Acknowledgement of Receipt of Materials					Printed/Typed Name					Signature					Month Day Year				
19. Discrepancy Indication Space																			
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.																			
Printed/Typed Name					Signature					Month Day Year									



To:

MARION STEEL CO
912 CHENEY AVE
MARION OH 43302

ATTN: Environmental Department

Generator:

MARION STEEL CO
912 CHENEY AVE
MARION OH 43302

ATTN: Environmental Department

CERTIFICATE OF DESTRUCTION

Document#: 0913094

Date: 3/22/91

Customer Number

00255700

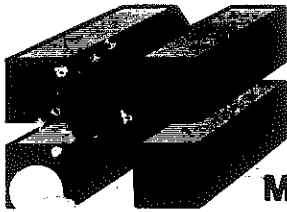
This document is to certify that S.D. Myers, Inc. has completed Chemical Destruction of your PCBs by utilizing our PCB-GONE Process as outlined in our PCB Destruction Permit and approved by the United States Environmental Protection Agency.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Manifest No.	Date Out of Service	Date of Receipt	Total Gals	Total Kgs	Start PCB PPM	Aroclor	End PCB PPM	Date Finished
00192	2/21/91	2/22/91	5000.0	16556.1		0000	<2	2/26/91

Note: Outgoing PCB-PPM is the maximum result obtained from the oil at the completion of the work.

David L. Belden
Environmental
Coordinator



WATS: 800-333-4011
TELE: 614-383-4011
FAX: 614 383-6429

PLEASE USE THIS
NO. IN ALL
CORRESPONDENCE

MARION STEEL COMPANY

912 CHENEY AVENUE

MARION, OHIO 43302

NO. 92591
INVOICE
DATE 9/25/91
SHIPPED
DATE 9/23/91

SOLD TO:

SHIPPED TO:

MAGNETEK
P.O. BOX 191
1776 CONSTITUTION AVE.
LOUISVILLE, OH 44641

CUSTOMER # — SALESMAN		BILL OF LADING #		CAR/TRUCK #	ROUTING	
		94251				
CUSTOMER ORDER NO.	ITEM	DESCRIPTION AND SIZE GRADE AND LENGTH	WEIGHT	UNIT PRICE	AMOUNT	

#7349-402019

1) 1 EACH

WESTINGHOUSE 26.6/33.3 MVA,
KV PRI, 13.8 KV SEC,
SERIAL #293707, CLASS OA/FA/FA
POWER TRANSFORMER
NON PCB, AS IS

\$12,000.00

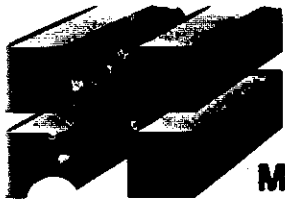
TERMS: NET 15 DAYS

FOB MILL—NO DISCOUNTS ALLOWED ON FREIGHT—

SALES CUSTOMER FILE

"SELLER REPRESENTS THAT WITH RESPECT TO THE PRODUCTION OF THE ARTICLES AND/OR THE SERVICES COVERED BY THIS INVOICE, IT HAS FULLY COMPLIED WITH PROVISIONS OF THE FAIR LABOR STANDARDS ACT OF 1938, AS AMENDED."

ACCT--



MARION STEEL COMPANY

912 CHENEY AVENUE

WATS: 800-333-4011
TELE: 614-383-4011
FAX: 614 383-6429

MARION, OHIO 43302

PLEASE USE THIS
NO. IN ALL
CORRESPONDENCE

NO. 92591
INVOICE DATE 9/25/91
SHIPPED DATE 9/23/91

SOLD TO:

SHIPPED TO:

MAGNETEK
P.O. BOX 191
1776 CONSTITUTION AVE.
LOUISVILLE, OH 44641

CUSTOMER # - SALESMAN		BILL OF LADING # 94251		CAR/TRUCK #	ROUTING
CUSTOMER ORDER NO.	ITEM	DESCRIPTION AND SIZE GRADE AND LENGTH	WEIGHT	UNIT PRICE	AMOUNT

#7349-402019

1) 1 EACH WESTINGHOUSE 26.6/33.3 MVA,
KV PRI, 13.8 KV SEC,
SERIAL # 293707, CLASS OA/FA/FA
POWER TRANSFORMER
NON PCB, AS IS

\$12,000.00

Remittance should be sent to
Marion Steel Company
c/o 00056
Cincinnati, OH - 45263

TERMS: NET 15 DAY

FOB MILL—NO DISCOUNTS ALLOWED ON FREIGHT—

CUSTOMER ORIGINAL INVOICE

PURCHASE ORDER



Bill Folk
Doc Carkins

PURCHASE ORDER NUMBER

7349 - 402019

THESE NUMBERS MUST APPEAR
ON ALL INVOICES, SHIPPING
PAPERS, PACKAGES, AND
ALL CORRESPONDENCE

1776 Constitution Avenue P.O. Box 191 Louisville, OH 44641
216 / 875-3333 FAX: 216 / 875-1551
Ref: Ohio Transformer

TO Marion Steel Company
912 Cheney Ave.
Marion, OH 43302

SHIP TO

ABOVE ADDRESS UNLESS INDICATED HERE

DATE OF ORDER 9-5-91		SHIP DATE Advise		CONFIRMING <input checked="" type="checkbox"/> TO Steve		SHIP VIA Best Way	
TERMS Net 15		FOR RESALE TAX EXEMPT <input checked="" type="checkbox"/>		ADD SALES TAX <input type="checkbox"/>		MARK SHIPMENT 402-019	
				DELIVERY TERMS: F.O.B. <input type="checkbox"/> SP <input type="checkbox"/> DEST. <input type="checkbox"/>		FRT. ALLOW <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/>	
ITEM NO.	QUANTITY ORDERED	UNIT	DESCRIPTION	UNIT PRICE	AMOUNT		
A	1	EA	Westinghouse 26.6/33.3 MVA, 133 KV PRI, 13.8 KV SEC, Serial #293707, Class OA/FA/FA Power Transformer				
			Non PCB, As Is,				
			Lot Net Loaded	12000	00		
			Shipping Contact: Steve Washburn (614) 383-4011				

INSTRUCTIONS: 1. INVOICE IN DUPLICATE.
2. MERCHANDISE PURCHASED ON A DELIVERED BASIS. TRANSPORTATION CHARGES MUST BE PREPAID.
3. RECEIVING HOURS - 7:30 A.M. TO 5:00 P.M. - MONDAY THRU FRIDAY.
4. NO SATURDAY DELIVERIES UNLESS OTHERWISE SPECIFIED.
5. THIS PURCHASE ORDER IS GOVERNED BY INSTRUCTIONS TO SELLER AND MAGNETEK TERMS AND CONDITIONS OF PURCHASE (SEE REVERSE SIDE)

MAGNETEK

By

Steve Washburn

AUTHORIZED SIGNATURE

VENDOR COPY

STRAIGHT BILL OF LADING - SHORT FORM (Original) - Not Negotiable.

Shipper's No. **94251**
Carrier's No. **2626**

Carrier

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

MARION, OHIO 9-23 1991 from MARION STEEL COMPANY

property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment.

Terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to WAGNATCH Ohio TRANSFORMER (Mail or street address of consignee - For purposes of notification only.)Destination LOUISVILLE State OH Zip Code 401641 County _____Delivery Address * 1776 CONSTITUTIONAL AVE
(* To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Route _____

Delivering Carrier

Car or Vehicle Initials

No.

No. Packages	Kind of Package, Description of Articles, Special Marks and Exceptions	Weight (Sub to Car)	Class or Rate	Check Column	Subject to Section 7 of Conditions of applicable bill of lading if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
1	Wagnotch				Marion Steel Co. (Signature of Consignor) If charges are to be prepaid write or stamp here "To Be Prepaid"
	206-33.2 WVA				
	13.2 kv PM				Received \$ _____ to apply in prepayment of the charges on the property described hereon.
	13.8 kv SEC				
	Scr 293707 CLASS OAF-A-FH				Agent or Cashier Per _____ (The signature here acknowledges the amount prepaid) Charges Advanced \$ _____
	Now DCB				
	Power transformer				
<p>* If the shipment is made by a carrier, the bill of lading shall state whether it is "carrier" or "shipper" property.</p> <p>NOTE - When the shipper is required to state specifically in writing the agreed or declared value of the property is hereby agreed to by the shipper to be not exceeding</p> <p>† The bill of lading is subject to the provisions set forth in the motor carrier's certificate thereon, and all other requirements of the Uniform Freight Classification.</p> <p>‡ Shipper's responsibility for stamp; not part of bill of lading approved by the Interstate Commerce Commission.</p>					

LOAD MUST BE TARPED

MARION STEEL COMPANY

Shipper, Per _____

Agent, Per _____

Permanent post-office address of shipper: 912 CHENEY AVE. MARION, OHIO 43302

MS-14

APTUS

April 26, 1991

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

DON DISTEL
MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OH 43302

RE: MARION STEEL COMPANY, Aptus Document No. AT15M

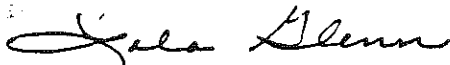
Dear DON DISTEL:

Enclosed, please find your copy of the hazardous waste manifest indicating that your waste material has been received and accepted by Aptus.

Immediately following the disposal of all your material, you will receive a complete Certificate of Disposal.

Once again, Aptus would like to express our appreciation to you as a valued customer. Should you have any questions, please feel free to contact our Customer Service Representative in Sales from 8:00 AM to 5:00 PM, Monday through Friday.

Sincerely,



Environmental Affairs

Enclosure

TS-17-423274

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 1

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OH D 03 22 71 97 5		Manifest Document No. A T 1 5 M		2. Page 1 of 3		Information in the shaded area is not required by Federal law.	
3. Generator's Name and Mailing Address: Marion Steel Company 912 Cheney Avenue Marion, OH 43302						A. State Manifest Document Number			
4. Generator's Phone (614) 383-4011						B. State Generator's ID			
5. Transporter 1 Company Name Tri-State Motor Transit CO.			6. US EPA ID Number M 0 D 0 9 5 6 3 8 9 9 8			C. State Transporter's ID		D. Transporter's Phone (417) 624-3131	
7. Transporter 2 Company Name			8. US EPA ID Number			E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Aptus, Inc. P.O. Box 1328/Hwy. 169 North Coffeyville, KS 67337			10. US EPA ID Number K S D 9 8 0 9 6 4 9 9 3			G. State Facility's ID		H. Facility's Phone (913) 251-6380	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers No. Type		13. Total Quantity	
a. RQ HAZARDOUS SUBSTANCE, SOLID, N.O.S., ORM-E, NA 9188 (POLYCHLORINATED BIPHENYLS)						915 D M		EST 01955 K	
b. RQ HAZARDOUS SUBSTANCE, SOLID, N.O.S., ORM-E, NA 9188 (POLYCHLORINATED BIPHENYLS)						064 D M		EST 00364 K	
c. 1955 364 2319 x 22									
d.									
14. Additional Description for Materials Listed Above a. drums of capacitors Storage Dates SEE ATTACHMENT b. drums of debris Storage Dates SEE ATTACHMENT						K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information See Enclosed Contingency Plan Work Order #71034 EMERGENCY CONTACT: 1-800-292-2558									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
17. Printed/Typed Name DONALD J. DISTEL						Signature Donald J. Distel		Month Day Year 10/10/91	
18. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name JAMES D SIMON						Signature James D Simon		Month Day Year 10/10/91	
19. Discrepancy Indication Space Discrepancy OK'd by Jerry Monroe 4-24-91 11a. 15 dms capacitors 4534 lbs., 2061 kgs. 11b. 2 dms debris 436 lbs., 198 kgs., 2 dms capacitors 480 lbs., 218 kgs. <i>Caw</i>									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Rick Smithson						Signature Rick Smithson		Month Day Year 10/11/91	

CONTINUATION SHEET

GENERATOR NAME	MANIFEST NUMBER	PAGE 2
MARION STEEL COMPANY	AT15M	OF 3

This continuation sheet contains the information required under 40CFR761.207 - THE MANIFEST-GENERAL REQUIREMENTS.

PCB WASTE TYPE	I.D.#	DATE REMOVED FROM SERVICE FOR DISPOSAL	WEIGHT IN Kg
DRUM OF DEBRIS > 500	1M	1-31-91	EST 200 91
DRUM OF DEBRIS > 500	2M	1-31-91	EST 200 91
DRUM OF DEBRIS > 500	3M	1-31-91	EST 91
DRUM OF DEBRIS > 500	4M	1-31-91	EST 91
DRUM OF CAPACITORS/PURE	5M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	6M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	7M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	8M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	9M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	10M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	11M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	12 AM M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	13M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	14M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	15M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	16M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	17M	1-31-91	EST 131
DRUM OF PURE CAPACITORS	18M	1-31-91	EST 131

CERTIFICATION:

I certify the information listed above accurately describes all of the PCB Waste contained on this manifest.

SIGNATURE	<i>Donald J. Dineen</i>
TITLE	SR. PROJECT ENGINEER
DATE	1-4-91

IF MORE SPACE IS NEEDED PLEASE USE ANOTHER CONTINUATION SHEET

CONTINUATION SHEET

GENERATOR NAME	MANIFEST NUMBER	PAGE OF	
MARION STEEL COMPANY	AT15M	3 3	
This continuation sheet contains the information required under 40CFR761.207 - THE MANIFEST-GENERAL REQUIREMENTS.			
PCB WASTE TYPE	I.D.#	DATE REMOVED FROM SERVICE FOR DISPOSAL	WEIGHT IN Kg
DRUM OF PURE CAPACITORS	19M	1-31-91	EST 131
CERTIFICATION:			
I certify the information listed above accurately describes all of the PCB Waste contained on this manifest.			
SIGNATURE			
TITLE	Sr. Prod. Engr.		
DATE	4-4-91		
IF MORE SPACE IS NEEDED PLEASE USE ANOTHER CONTINUATION SHEET			

APTUS

December 4, 1991

Aptus

Environmental Services

P.O. Box 1328

Coffeyville, KS 67337

(316) 251-6380

FAX (316) 251-7498

Sales FAX (316) 251-1095

Incinerator FAX (316) 251-0089

DON DISTEL
MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OH 43302

RE: Aptus Document No. AT15M

Dear DON DISTEL:

Enclosed, please find your Certificate of Disposal from Aptus, which certifies that your waste material received on the manifest referenced has been properly disposed. Also, enclosed is a detail summary of the movement of your material.

Aptus would like to express our appreciation to you and hope that we can assist you in solving your waste management needs in the future.

Should you have any questions regarding our services, please contact your Customer Service Representative from 8:00 AM to 5:00 PM.

24 Hour Spill Response call 1-800-292-2558 or (316)251-6380.

Enclosures

APTUS

December 4, 1991

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0065

CERTIFICATE OF DISPOSAL

NO. 9425

MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OH 43302

- A. THIS IS TO CERTIFY THAT THE HAZARDOUS SUBSTANCE MANIFESTED TO **APTUS** ON APTUS DOCUMENT #AT15M WAS DISPOSED OF IN ACCORDANCE WITH 40 CFR 761 (AND 40 CFR 264 IF APPLICABLE) AS OF 11/26/91. ATTACHED, IS A DETAIL REPORT WHICH IDENTIFIES THE DATE(S) OF DISPOSAL AND THE PROCESS UTILIZED FOR EACH WASTE LISTED.
- B. UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S. C. 1001 AND 15 U.S. C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE AND COMPLETE. AS TO THE IDENTIFIED SECTIONS(S) (A.) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

APTUS

EPA ID # KSD981506025


BRIAN BROSNAN
MANAGER, ENVIRONMENTAL AFFAIRS

Aptus

DETAIL REPORT

PAGE NO. 1

GENERATOR

MARION STEEL COMPANY
912 OHENEY AVENUE

CORRESPONDENT

ENVIRONMENTAL MANAGEMENT CTRL
1141 COUNTY ROAD 51

WORKORDER # 71034

APT DOC # AT15M
OUST MANIFEST:

MARION

OH 43302

OH 43430

STATE MANIFEST:

EPA # 040032271975

PHONE: 6143834011

PHONE: 4196558378

DATE OF REPORT: 12/04/91

DON DISTEL

JERRY MOYNOE

SALESMAN: JEFF SMITH

CODE: 0014768

CODE: 0006628

HOLD BACK: 0%

ITEM	PROTYPE	CNT	DESCRIPTION	SERIAL/DRUM #	CONCEN	UNIT	WT	QTY	UNIT	LOCATN	DISPOSAL FACILITY	SHIPMAN	CONJMBER	ACCEPTED OUT/SRVC SHIP	DESTROYD COSENT	
1	CAPS	1		1 of 15/	284	284.00		284		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
2	CAPS	1		2 of 15/	274	274.00		274		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
3	CAPS	1		3 of 15/	286	286.00		286		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
4	CAPS	1		4 of 15/	292	292.00		292		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
5	CAPS	1		5 of 15/	258	258.00		258		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
6	CAPS	1		6 of 15/	290	290.00		290		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
7	CAPS	1		7 of 15/	484	484.00		484		4027000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCP69	9425	04/16/91 01/31/91 10/25/91 11/11/91 12/04/91
8	CAPS	1		8 of 15/	290	290.00		290		4027000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCP69	9425	04/16/91 01/31/91 10/25/91 11/11/91 12/04/91
9	CAPS	1		9 of 15/	390	390.00		390		4027000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCP69	9425	04/16/91 01/31/91 10/25/91 11/11/91 12/04/91
10	CAPS	1		10 of 15/	278	278.00		278		4027000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCP69	9425	04/16/91 01/31/91 10/25/91 11/11/91 12/04/91
11	CAPS	1		11 of 15/	274	274.00		274		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
12	CAPS	1		12 of 15/	288	288.00		288		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
13	CAPS	1		13 of 15/	270	270.00		270		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
14	CAPS	1		14 of 15/	284	284.00		284		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
15	CAPS	1		15 of 15/	292	292.00		292		4033000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCPT71	9425	04/16/91 01/31/91 10/25/91 11/26/91 12/04/91
16	DEBI	1	SPP-HARD HAT-LEATHER	1 of 2/3M	116	116.00		116		4025000	APTUS	INCINERATOR	COFFEYVILLE, KS	CBV87	9425	04/16/91 01/31/91 08/23/91 10/03/91 12/04/91
17	DEBI	1	SPP-HARD HAT-LEATHER	2 of 2/4M	320	320.00		320		4025000	APTUS	INCINERATOR	COFFEYVILLE, KS	CBV87	9425	04/16/91 01/31/91 08/23/91 10/03/91 12/04/91
18	CAPS	1		1 of 2/2M	256	256.00		256		4027000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCP69	9425	04/16/91 01/31/91 10/25/91 11/11/91 12/04/91
19	CAPS	1		2 of 2/1M	224	224.00		224		4027000	APTUS	INCINERATOR	COFFEYVILLE, KS	CCP69	9425	04/16/91 01/31/91 10/25/91 11/11/91 12/04/91

MANIFESTS ON JOB NUMBER 71034

AT15M

v

PCB Annual Document

EPA ID NO. OH D032271975

MARION STEEL COMPANY
912 CHERNEY AVENUE
MARION OHIO 43302

PCB ANNUAL DOCUMENT SUMMARY IN ACCORDANCE WITH 761.180(a)(2)(iii),(iv),(v),(vi)
FOR REPORTING PERIOD JANUARY 1, 1991 - DECEMBER 31, 1991

PCBs/PCB ITEMS IN CONTAINERS	REMOVED FROM SERVICE	IN STORAGE FOR DISPOSAL	IN TRANSPORT FOR DISPOSAL	IN SERVICE AT END OF YEAR	
TOTAL WEIGHT(kg) ID OF CONTENTS	2329 CAPCTRS., DEBRIS, ETC..	1/31/91	4/4/91	6 18544.4	TOTAL NUMBER TOTAL WEIGHT(kg) OF PCBs IN TRANSFORMERS
PCB BULK WASTE					
TOTAL CAPACITY(gal) TOTAL WEIGHT(kg)	5000 16492	12/15/90	2/22/91		PCB CAPACITORS
		N/A			TOTAL NUMBER TOTAL WEIGHT(kg) OF PCBs IN CAPACITORS

PCB TRANSFORMERS

TOTAL NUMBER 1
TOTAL WEIGHT(kg) OF 16492
PCBs IN TRANSFORMERS

12/15/90 N/A 2/22/91

PCB CAPACITORS

TOTAL NUMBER 32
TOTAL WEIGHT(kg) OF 500
PCBs IN CAPACITORS

1/31/91 1/31/91 4/4/91

* 761.180(a)(2)(ii) - SEE ANNUAL REPORT SECTION IV(1)
761.180(a)(2)(vii) DOES NOT APPLY TO THIS FACILITY
761.180(a)(2)(viii) - SEE ANNUAL REPORT SECTION IV(3)

ANNUAL REPORT

OF

POLYCHLORINATED BIPHENYLS (PCB'S)

THE MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OHIO 43302
(614) 383-4011

FOR REPORTING PERIOD

JANUARY 1, 1990 - DECEMBER 31, 1990

REPORT REVISED DECEMBER 1, 1992

PREPARED BY: SCOTT CONWAY

GENERATOR U.S. EPA ID #

OH D032271975

TABLE OF CONTENTS

I	PCB Contaminated Electrical Equipment at Year Beginning
II	Summary of PCB Activity
III	Quarterly Inspection Report
IV	Supporting Documentation 1) Shipping Manifests 2) Certificates of Disposal 3) Correspondence
V	PCB Annual Document

I

PCB Contaminated
Electrical Equipment
at
Year Beginning

1. Equip. Description: 500 KVA Transformer, 13,800 - 480V
Location: Maintenance Building Sub Station
Serial Number: H-885865
Manufacturer: General Electric
Date Purchased/
Placed in Service: 1977
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Pyranol
B. Volume (Gal) 112
C. Weight (kg) 631

2. Equip. Description: 2000 KVA Transformer, 13,800 - 480V
Location: Bag House Sub Station
Serial Number: H-884638
Manufacturer: General Electric
Date Purchased/
Placed in Service: 1976
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Pyranol
B. Volume (Gal) 243
C. Weight (kg) 1384

3. Equip. Description: 1000 KVA Transformer, 13,800 - 480V
Location: #1 Unit (West) Melt Shop Sub Station
Serial Number: YBR-83871
Manufacturer: Westinghouse
Date Purchased/
Placed in Service: 1967
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name:	Inerteen
B. Volume (Gal)	195
C. Weight (kg)	987

4. Equip. Description: 1000 KVA Transformer, 13,800 - 480V
Location: #2 Unit (East) Melt Shop Sub Station
Serial Number: YBR-83872
Manufacturer: Westinghouse
Date Purchased/
Placed in Service: 1967
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name:	Inerteen
B. Volume (Gal)	195
C. Weight (kg)	984

5. Equip. Description: 1000 KVA Transformer, 13,800 - 480V
Location: Mill Building 480V Sub Station
Serial Number: H-887303
Manufacturer: General Electric
Date Purchased/
Placed in Service: 1975
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name:	Pyranol
B. Volume (Gal)	156
C. Weight (kg)	883

6. Equip. Description: 20/26.6/33 MVA Transformer, 138,000/
13,800
Location: Main Sub Station (East Side)
Serial Number: 293707
Manufacturer: Westinghouse
Date Purchased/
Placed in Service: 1967
Date Removed
from Service: 12/15/90

Description of PCB Fluid:

A. Brand Name: Oil (Contaminated)*
B. Volume (Gal) 5,580
C. Weight (kg) 16,556.1

*Note: Prior to 11/23/90, this oil was at a contamination level of 77 ppm. After S.D. Meyer retrofill, contamination level was less than 2 ppm. Transformer was taken out of service on 12/15/90. On 3/91 the oil was removed by S.D. Meyer from transformer and properly disposed of. The transformer was sold to Magnetek on 9/25/91.

7. Equip. Description: 7.5 MVA Transformer, 138,000/13,800
Location: Main Sub Station (West Side)
Serial Number: FLR 47281
Manufacturer: Westinghouse
Date Purchased/
Placed in Service: 1967
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Oil (Contaminated)*
B. Volume (Gal) 4,130
C. Weight (kg) 13,675.4

*Note: Oil is PCB contaminated at 160 ppm, retrofilled
on 11/22/90, awaiting oil analysis to
declassify.

8. Equip. Description: 2.5 KVAR Capacitor Assembly
Location: Main Sub Station (West Side)
Serial Number: 72111547
Manufacturer: Westinghouse
Date Purchased/
Placed in Service: 1976
Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Inerteen
B. Volume (Gal) .94
C. Weight (kg) 4.7

9. Equip. Description: 3 Furnace Switch Gear Capacitors
100 VAR, 14,400V

Location: "B" Furnace (Upper)

Serial Number: 7107-0111, 7107-0112, 7107-1933

Manufacturer: Westinghouse

Date Purchased/
Placed in Service: 1980

Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Inerteen

B. Volume (Gal) 2.65

C. Weight (kg) 13

10. Equip. Description: 3 Furnace Switch Gear Capacitors
100 VAR, 13,800V

Location: "B" Furnace (Lower)

Serial Number: L02-4130, L02-4146, L02-4124

Manufacturer: General Electric

Date Purchased/
Placed in Service: 1976

Date Removed
from Service: 5/30/90 (1 Cap. L02-4130)

Description of PCB Fluid:

A. Brand Name: Pyranol

B. Volume (Gal) .5

C. Weight (kg) 2.5

11. Equip. Description: 3 Furnace Switch Gear Capacitors
100 VAR, 14,400V

Location: "A" Furnace (Upper)

Serial Number: No Nameplate on 2 Capacitors
7107-0113

Manufacturer: Westinghouse

Date Purchased/
Placed in Service: 1980

Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Inerteen

B. Volume (Gal) 2.73

C. Weight (kg) 13.5

12. Equip. Description: 3 Furnace Switch Gear Capacitors
100 VAR, 13,800V

Location: "A" Furnace (Lower)

Serial Number: C-54851, C-54862, C-54860

Manufacturer: General Electric

Date Purchased/
Placed in Service: 1967

Date Removed
from Service: 5/30/90 (2 Caps C-54851, C-54860)
* C-54862 moved to "B" Furnace Lower

Description of PCB Fluid:

A. Brand Name: Pyranol

B. Volume (Gal) .5

C. Weight (kg) 2.5

13. Equip. Description: 36 Mill Capacitors
15 KVAR, 2,400V

Location: Rolling Mill Sub Station

Serial Number: (South Cabinet) 50B525, 50B507,
50B506, 50B515, 50B516, 50B532,
50B531, 50B533, 50B534, 50B513,
50B514, 50B523

(Middle Cabinet) 50B528, 50B510,
50B512, 50B424, 50B522, 50B529,
50B517, 50B508, 50B504, 50B509,
50B521, 50B526

(North Cabinet) 51J108, 50E733,
50E763, 50E749, Remaining 8 are 50
Series, Serial #'s unknown.

Manufacturer: Westinghouse

Date Purchased/
Placed in Service: 1955

Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Inerteen

B. Volume (Gal) 1.72

C. Weight (kg) 8.3

14. Equip. Description: 27 Main Sub Capacitors
200 VAR, 7,960V

Location: Main Sub Station (North Bank)

Serial Number: (Top Bank) 7010-4539, 7010-2039,
7010-2034, 7010-2025, 7010-2383,
7010-2076, 7010-2088, 7010-2037

(Middle Bank) 7010-2142, 7010-2134,
7010-2017, 7010-2087, 7010-2268,
7010-2344, 7010-2326, 7010-2091,
7010-2118

(Bottom Bank) 7010-2038, 7209-4523,
7010-2197, 7010-2040, 7010-2042,
7010-2041, 7010-2152, 7010-2030,
7010-2184, 7010-2137

Manufacturer: Westinghouse

Date Purchased/
Placed in Service: 1967

Date Removed
from Service: N/A

Description of PCB Fluid:

A. Brand Name: Inerteen

B. Volume (Gal) 3.1

C. Weight (kg) 15.7

15. Equip. Description: 6 Main Sub Capacitors
200 VAR, 8,320V

Location: Main Sub Station (South Bank)

Serial Number: (Top Bank) 7601-0421, 7609-3018
(Middle Bank) 7601-0398, 7601-0418
(Bottom Bank) 7601-0400, 7601-0419

Manufacturer: Westinghouse

Date Purchased/
Placed in Service: 1976

Date Removed
from Service: 5/3/90 (4 Total - serial nos.
7601-0398, 7601-0418, 7601-
0400, 7610-0419)

Description of PCB Fluid:

A. Brand Name: Inerteen

B. Volume (Gal) 3.72

C. Weight (kg) 18.5

II

Summary of PCB Activity

ACTIVITY REPORT

ANNUAL SUMMARY OF POLYCHLORINATED BIPHENYLS (PCBS) JANUARY 1, 1990-DECEMBER 31, 1990

MARION STEEL COMPANY, 912 CHENEY AVENUE, MARION OH., 43302
GENERATOR U.S. EPA ID NO. OH D032271975

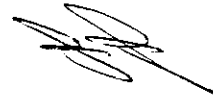
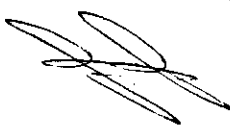
NO.	EQUIPMENT DESCRIPTION	SERIAL NO.	LOCATION	PCB STATUS	VOL.(GAL.)	WT. (KGS)	DATE IN SERV.	ACTIVITY	DATE REMOVED	DATE DISPOSED	VENDOR	MFST. NO.	CRT. DSPL. NO.
1.	WEST. 20 MVA TRANSFR.	293707	MAIN SUB	53	5590	N/A	1967	RETROFILL	11/22/90	11/22/90	S.D.MEYER	90184RT	0903527
2.	4 WEST. 200 KVAC CAPTES.	7601-0398 7601-0418 7601-0400 7601-0419											
3	GE 13,800 V CAPS.	L024130 C54851 C34860											
7	TOTAL		MAIN SUB	INERTEN	N/A	584	1967	VOLUNTARY REMOVAL	5/10/90	6/30/90	APTUS	0177H	5741
3.	WEST. 7.5 MVA TRANSFR.	FLR47281	MAIN SUB	160	4130	N/A	1967	RETROFILL	11/22/90	11/22/90	S.D. MEYER	90184RT	0903527

III

Quarterly Inspection Report


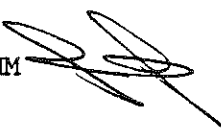
P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PMM		1-9-90
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PMM		1-9-90
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	PM	1-11-90
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	PM	1-11-90
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	PM	1-11-90
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	PM	1-11-90
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	PM	1-11-90
8. Baghouse	G.E. H-884638	2,000KVA	1M	PM	1-11-90
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	PM	1-11-90

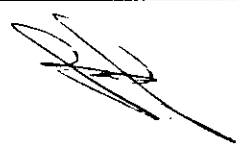
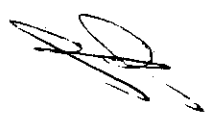
P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PMM		4-11-90
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PMM		4-11-90
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	pm	4-12-90
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	pm	4-12-90
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	pm	4-12-90
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	pm	4-12-90
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	pm	4-12-90
8. Baghouse	G.E. H-884638	2,000KVA	1M	pm	4-12-90
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	pm	4-12-90

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
.. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PPM		7-2-90
.. Mill Sub	G.E. H-887303	1,000KVA	1M-PPM		7-2-90
. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	PM	7-2-90
. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	PM	7-2-90
. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	PM	7-2-90
. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	PM	7-2-90
. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	PM	7-2-90
. Baghouse	G.E. H-884638	2,000KVA	1M	P	7-2-90
. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	PM	7-2-90

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PMM		
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PMM	HJD (2)	Oct 18, 1990
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M	PM ✓	10-19-1990
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M	PM ✓	10-19-1990
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM	PM ✓	10-19-1990
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM	PM ✓	10-19-1990
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM	PM ✓	10-19-1990
8. Baghouse	G.E. H-884638	2,000KVA	1M	PM X	10-19-1990
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM	PM ✓	10-19-1990

* Room cluttered due to baghouse addition. This will be taken care of after new baghouse start up est. 11-30-90

P.C.B. CONTAMINATED TRANSFORMER

QUARTERLY INSPECTION REPORT

LOCATION	TRANS. MFG./SERIAL #	SIZE	TYPE OIL	INSP. BY	DATE INSPECTED
1. Mill Sub	Westinghouse 1213025 (Out Of Serv. On Site)	250KVA	1M-PPM		
2. Mill Sub	G.E. H-887303	1,000KVA	1M-PPM		
3. Melt Shop	Westinghouse YBR83872	1,000KVA	1M		
4. Melt Shop	Westinghouse YBR83871	1,000KVA	1M		
5. Main Sub	Westinghouse 293707	20/30 MVA	53-PPM		<i>out of service Dec 1990</i>
6. Main Sub	Westinghouse PLR47281	7.5MVA	160-PPM		
7. Melt Shop	Pennsylvania 35466-1	18,750KVA	35-PPM		
8. Baghouse	G.E. H-884638	2,000KVA	1M		
9. Maint. Sub	G.E. 11-885865	500KVA	1M-PPM		

IV

Supporting Documentation

- 1) Shipping Manifests
- 2) Certificates of Disposal
- 3) Correspondence

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 		Manifest Document No. 90-239-RT		2. Page 1 of 2		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Marion Steel Co. 912 Cheney Ave./Marion, OH 43302						A. State Manifest Document Number 90-239-RT							
4. Generator's Phone ((XX)XXX-XXXX) (614) 383-4011						B. State Generator's ID							
5. Transporter 1 Company Name S. D. Myers, Inc.			6. US EPA ID Number O H D 0 5 3 5 7 6 2 9 4 			C. State Transporter's ID							
7. Transporter 2 Company Name			8. US EPA ID Number 			D. Transporter's Phone 216-633-2666							
9. Designated Facility Name and Site Address S. D. Myers, Inc. 180 South Ave. Tallmadge, OH 44278						E. State Transporter's ID							
						F. Transporter's Phone							
10. US EPA ID Number O H D 0 5 3 5 7 6 2 9 4 						G. State Facility's ID OH053576294							
						H. Facility's Phone 216-633-2666							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		I. Waste No.	
a. X RQ (1/.45), Hazardous Substance, Liquid, N.O.S., ORM-E, NA9188, (Polychlorinated Biphenyls) HM						XIXI Z T IXI		5580		G			
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above (oil under 500 ppm)						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name X FAY AIT					Signature Joy Potts			Month Day Year 1/1/23 19K					
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name JAMES E RODGERS					Signature James E Rodgers			Month Day Year 1/1/23 19K					
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name					Signature			Month Day Year					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name					Signature			Month Day Year					

U



To:

MARION STEEL CO
912 CHENEY AVE.
MARION OH 43302

ATTN: Environmental Department

Generator:

MARION STEEL CO
912 CHENEY AVE.
MARION OH 43302

ATTN: Environmental Department

CERTIFICATE OF DESTRUCTION

Document#: 0903527

Date: 1/15/91

Customer Number

00255700

This document is to certify that S.D. Myers, Inc. has completed Chemical Destruction of your PCBs by utilizing our PCB-GONE Process as outlined in our PCB Destruction Permit and approved by the United States Environmental Protection Agency.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Manifest No.	Date Out of Service	Date of Receipt	Total Gals	Total Kgs	Start PCB PPM	Aroclor	End PCB PPM	Date Finished
90-184-RT	11/22/90	11/23/90	4130.0	13675.4	51	1260	<2	11/28/90

Note: Outgoing PCB-PPM is the maximum result obtained from the oil at the completion of the work.

David L. Belden
Environmental
Coordinator



To:

MARION STEEL CO
912 CHENEY AVE.
MARION OH 43302

Generator:

MARION STEEL CO
912 CHENEY AVE.
MARION OH 43302

ATTN: Environmental Department

ATTN: Environmental Department

CERTIFICATE OF DESTRUCTION

Document#: 0903530

Date: 1/15/91

Customer Number

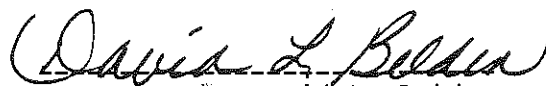
00255700

This document is to certify that S.D. Myers, Inc. has completed Chemical Destruction of your PCBs by utilizing our PCB-GONE Process as outlined in our PCB Destruction Permit and approved by the United States Environmental Protection Agency.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Manifest No.	Date Out of Service	Date of Receipt	Total Gals	Total Kgs	Start PCB PPM	Aroclor	End PCB PPM	Date Finished
90-239-RT	11/23/90	11/26/90	5580.0	18476.6	74	1254	<2	12/03/90

Note: Outgoing PCB-PPM is the maximum result obtained from the oil at the completion of the work.


David L. Belden
Environmental
Coordinator



041-08 (858)

- ☐ P. O. BOX 550, Lakeville, MN 55044
☐ P. O. BOX 1328, Colleyville, KS 67337
☐ 4120 S. 500 West #2, Murray, UT 84123

OFFICE USE ONLY

APTUS PCB WASTE PROFILE

Please type or print legibly one profile per waste type

1. GENERATOR INFORMATION:
Salesperson: Jeff Smith
Generator: Marion Steel Company
Address: 912 Cheney Avenue
Marion, OH 43302
Phone Number: (614) 383-4011
Technical Contact: Steve Washburn
Facility EPA ID #: OHD 032271975
State ID #: N/A
2. BILLING INFORMATION: ☐ Bill Generator
Billing Name: Environmental Management Cont
Address: 1141 County Road #51
Genoa, OH 43430
Phone Number: (419) 855-8378
Company Contact: Fred T. Sander
3. Generating Process Description: Replacement
of Old Capacitors
Common Name of Waste: Capacitors
Rate of Generation: 1340 Lbs. per

(qty)(gal/lbs)(month/quarter/year)

Amount on hand: 1340 Lbs. APPROXIMATE
☒ One time only shipment
State Waste codes
4. Composition:
☐ <500 ppm Oil ☐ >500 ppm Oil ☐ Askarel
☐ <500 ppm Transformer ☐ >500 ppm Transformer
☒ Capacitors
☐ Detoxification Oil
☐ PCB Flush(Name)
☐ DEBRIS (Check all that apply)
☐ Miscellaneous Debris

re Suits Rags Plastics, Gloves, Absorbent,
Catch Pans, Brooms, Mops, Wood, Floor Sweepings.

☐ Other Debris
☐ Test Kits
☐ Laboratory Debris (Please List)
☐ Empty Drums
☐ Soil < 10 Drums ☐ Soil > 10 Drums
☐ Sludge (Requires Complete Characterization)
☐ Water
5. Physical Description:
Physical State:
☐ Liquid ☐ Semi-Solid ☒ Solid
Transformers
☐ Full
☐ Drained
☐ Drained and Flushed
6. INCINERATION PARAMETERS: (Soil and Water only)
BTU/lb: % Ash:
% Water (by WT.):
Flash Point: Total Sulfur:
Specific Gravity: Viscosity:
Total Organic Halogen (%):
PCB: Miscibility with water:
7. Transportation Information:
Is Waste DOT Hazardous? ☒ YES ☐ NO
Proper DOT Shipping Name: RO Hazardous Substance Liquid NOS Polychlorinated Biphenyls
Hazardous Class: ORM - E UN/NA # NA 9188 RO: 1 Lb. lbs/kg
Method of shipment: ☐ Bulk ☒ Drums ☐ Other Container Size & Description: 55 Gal. Drums on
Pick-up Site Description: Steel Mill Pallets
8. Certification: I hereby certify that the enclosed sample and/or analytical data is representative of the waste. I also certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omission of composition or properties exists and that all known or suspected hazards have been disclosed.
I authorize Aptus to act as the Generator's agent in matters concerning management of the aforementioned waste
- X Date 8-20-90 Authorized Signature X [Signature]
Title X SENIOR PROJECT ENGINEER
- Comments:

Please attach any Material Safety Data Sheets, laboratory analyses, handling precautions, and comments which apply to the waste

APTUS RESERVES THE RIGHT TO REJECT ANY MATERIAL THAT DOES NOT CONFORM TO THE INFORMATION GIVEN ABOVE.

NON-CONFORMING MATERIAL WILL BE HANDLED AT AN EXTRA CHARGE OR RETURNED TO THE GENERATOR AT THEIR EXPENSE

WHITE
ENVIRONMENTAL AFFAIRSYELLOW
OPERATIONSPINK
SALESGOLD
CUSTOMER